



# United States Department of the Interior

OFFICE OF THE ASSISTANT SECRETARY  
POLICY, MANAGEMENT AND BUDGET  
Washington, DC 20240



**JUN 28 2006**

In Reply To:  
ER 06/246

Mr. David Kling  
Director  
Federal Facilities Enforcement Office  
Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

Dear Mr. Kling:

This letter is in response to the request by the Administrator – Office of Enforcement and Compliance Assurance, Environmental Protection Agency, for a report by the Department of the Interior (DOI) on the implementation of Executive Order (E.O.) 13148, "Greening the Government through Leadership in Environmental Management." The enclosed progress report by DOI is for calendar year (CY) 2005.

As you will see in our report, DOI has made significant progress in CY 2005 on the implementation of E.O. 13148. Furthermore, we are firmly committed to the implementation of environmental management systems among its Bureaus and Offices and across its many Department-wide activities and functions.

If you have any questions, please contact Willie Taylor, Director, Office of Environmental Policy and Compliance, at 202-208-3891.

Sincerely,

R. Thomas Weimer  
Assistant Secretary

Enclosures

**U. S. Department of the Interior  
Calendar Year 2005 Progress Report  
on the Implementation of Executive Order 13148  
“Greening the Government through Leadership in Environmental Management”**

**EXECUTIVE SUMMARY**

Leadership in environment management is critical to good stewardship of our Nation’s natural and cultural resources and the U.S. Department of the Interior (DOI) is fully committed to this effort. This Executive Summary provides an overview of activities by DOI Bureaus and Offices in fulfilling the requirements of Executive Order 13148. The attached report provides more in-depth description of these activities.

**DEPARTMENTAL OFFICES**

**Office of Environmental Policy and Compliance (OEPC):** The OEPC chairs the DOI Environmental Management Systems (EMS) Council and coordinates Executive Order (E.O.) 13148 activities and EMS implementation to ensure that environmental accountability is integrated into agency day-to-day activities and long-term planning. In chairing, the DOI EMS Council, the OEPC was actively involved in the preparation of the DOI Environmental Scorecard. The OEPC has prepared annual reports on Bureau environmental auditing programs since Fiscal Year (FY) 1999. For FY 2005, a total of 576 environmental audits were performed of the reported total of 3,479 facilities. In FY 2005, Bureaus reported a total of 6,055 audit findings with 2,217 (37%) corrective actions completed, based upon these audit findings. A cumulative total of 3,680 environmental audits have been completed to date for all-years. Also, for Calendar Year (CY) 2005, there were 484 designated appropriate facilities reported by DOI Bureaus and Offices and 305 (63%) facility level EMS’s implemented or in the process of being implemented. The DOI is committed to the President’s Management Council Compliance Management Improvement Initiative (PMCCMII). In support of the PMCCMII, and as part of the OMB Environmental Management Scorecard process, DOI has agreed to include electronics stewardship and green purchasing in DOI environmental audit and EMS programs, adopt Interagency E.O. 13148 Working Group metrics, and monitor overall Bureau environmental compliance using EPA’s online compliance tracking system (OTIS).

**Office of Acquisition and Property Management (PAM):** The PAM issued policy guidance on May 27, 1993, in a DOI Acquisition Policy Release (DIAPR) 93-18. The policy calls for taking action to minimize the procurement of ozone depleting substances (ODS) by informing engineering and environmental staffs of E.O.12843 requirements; initiating program review of standards and specifications to remove ozone-depleting substances; and tracking the progress of Bureaus and Offices. Under DIAPR 97-2, issued December 2, 1996, DOI established policy to maximize the use of alternatives to ODS in specifications and contracts in accordance with FAR clause requirements. Federal Acquisition Regulation (FAR) 52-223.11, "ODS" and FAR 52-223-12, "Refrigeration Equipment and Air Conditioners" are required clauses for inclusion in contract requirements. The DOI has led one of the Federal Government’s most successful programs for Alternative Fuel Vehicles (AFVs). The DOI has met or exceeded the Energy Policy Act requirement and the goals outlined in Executive Order 13149, Greening the

Government through Federal Fleet and Transportation Efficiency. The DOI anticipates achieving the AFV acquisition goal for FY 2006 for the eighth consecutive year.

**National Business Center (NBC):** The NBC awarded a multi-year custodial contract that includes use of environmentally safe, non-toxic, and healthful custodial products in the Interior Complex to address reduction goals for Federal agency release of toxic chemicals. Chemical cleaning products used under this contract meet or exceed mandatory criteria for reducing the release of toxic chemicals. The NBC also recycles computers, Ni-Cad batteries, carpet and padding, toner cartridges, and fluorescent tubes. The NBC is working with the General Services Administration to utilize the Main Interior Building Modernization Project to evaluate environmentally preferable products, as it is a U.S. Green Building Council Leadership in Energy and Developmental Design (LEED) for existing buildings (EB) pilot project. The work is being accomplished, as part of this project, will earn credit toward building certification if/as permitted by the LEED-EB pilot program. The NBC issued an Environmental Management Policy and has four designated appropriate facilities.

## **BUREAUS**

**Bureau of Indian Affairs (BIA):** The BIA continues to conduct multimedia environmental audits under the BIA Environmental Management Audit Program (EMAP). The BIA is developing an EMS strategy that builds on the foundation of its audit program with achieving compliance using sustainable, pollution prevention approaches as a top priority. Also, BIA developed EMS audit criteria as part of the EMAP. For FY 2005, 97 environmental audits were performed including BIA agencies, schools, and detention centers, and police departments. A significant portion of BIA facilities operate under contract or grant to Tribes. The BIA has been challenged in developing an EMS that will address these facility operations in a manner that is effective and sensitive to Tribal issues. The BIA cannot mandate these entities to develop an EMS but plans to encourage the development of EMS within tribal operations and will make EMS development tools available to them. The BIA identified 86 designated appropriate facilities and 3 pilot EMS's for CY 2005.

**Bureau of Land Management (BLM):** The BLM continues to incorporate energy efficiency, conservation, and environmental preferable, and performance provisions into policies, plans, operations, and activities. The Baseline Compliance Assessment - Safety, Health, and the Environment (CASHE) program audits have been completed at every field office and major facility in the BLM. In FY 2005, BLM completed environmental audits at 36 organizational units. Field offices update the status of their CASHE findings and corrective actions annually. Findings, root causes, and corrective actions are tracked, used to identify systemic problems, and evaluated against BLM-wide performance goals. The percentage of BLM organizational units rated in good safety, health, and environmental condition increased from 49% in FY 2001 to 78% in FY 2005. The BLM issued EMS guidance and will complete its designation of appropriate facilities by the end of 2006.

**Bureau of Reclamation (BOR):** Each of the five BOR Regions has a Regional HazMat Coordinator assigned as the Regional EMS coordinator. Environmental audits are conducted to determine facility compliance with applicable Federal, state, and local rules, regulations, and standards. The BOR completed 45 environmental compliance audits in FY 2005. The BOR will

use two pilot implementation facilities, Yuma and Lake Berryessa as models for the rest of BOR's EMS implementation during 2006. BOR will issue Bureau-wide EMS policy and implementation guidance very soon. However, three BOR regions have already drafted their own EMS guidance. The Bureau allocated resources specifically for contract support to implement EMS and that allocation is currently focused on the two pilot facilities. The BOR designation of their appropriate facilities should be complete by the end of 2006.

**Fish and Wildlife Service (FWS):** For FY 2005, the FWS completed 208 environmental audits including both formal and informal audits. Compliance findings are tracked on a centrally managed database. The FWS continues to implement EMS at facilities determined to be of appropriate size, complexity, and environmental impact. The FWS provided \$150,000 as a line item in the 2005 construction budget for EMS implementation. Additional funding necessary to implement EMS was drawn from existing operating budgets at the regional and Headquarters level. Each facility was provided with \$5,000 seed money, to be spent on corrections and/or activities to further their EMS. At the close of 2005, 66 facilities or 100% of FWS designated appropriate facilities implemented EMS. The FWS developed its own EMS Self-Declaration Protocol in accordance with DOI's EMS Self-Declaration Protocol. This protocol will be applied Service wide to EMS's one year or older during 2006.

**Minerals Management Service (MMS):** The MMS leases all buildings from the General Services Administration. Although the MMS is not required to have an EMS, or required to perform environmental audits of its facilities, it is proactive in other environmental areas. For example, on February 27, 2006, the MMS issued Acquisition Management Memorandum No. 2006-001, establishing MMS' Affirmative Procurement Program (APP). The APP formalizes MMS' goal to increase purchase of recycled-content products and environmentally preferable products and services to the extent feasible, consistent with price, performance, availability, and safety considerations. In addition to requiring consideration of environmental factors in acquisition process, this policy requires acquisition personnel, including MMS business-line charge card holders, to attend green procurement training, preferably through the Office of Personnel Management's Gov Online Learning Center (GOLearn.gov). The MMS Support Services Office considers the LEEDs planning when purchasing furniture and carpet.

**National Park Service (NPS):** The NPS developed an environmental audit closure tracking tool that facilities are required to use to track progress in audit finding closures. For FY 2005, 27 environmental audits were performed along with 33 concession audits performed by the NPS Concessions Environmental Management Program (CoEMP). The NPS currently has 8 parks that are certified under ISO 14001 and 2 parks under EPA's National Environmental Performance Track. The NPS developed an EMS Self-Declaration Protocol that includes procedures for auditing a park-level EMS and a process by which a park Superintendent can declare that an EMS is fully implemented. For CY 2005, 207 (69%) of the 299 NPS designated appropriate facilities, have either implemented or are in the process of implementing facility-level EMS's. As of April 2006, the EMS tracking system shows that approximately 84% of NPS designated appropriate facilities have developed a self-declaration procedure. Also, approximately 34% of the 181 concessioners have been issued new concession contracts requiring an EMS.

**Office of Surface Mining (OSM):** Although OSM does not own, operate, or maintain facilities subject to the requirements of E.O. 13148, OSM supports Departmental efforts to develop a sound EMS. Furthermore, OSM actively promotes environmentally friendly practices under other Greening executive orders, including those governing procurement, recycling and waste prevention. For FY 2005, OSM completed 20 environmental audits and completed baseline audits at each OSM office. Currently, another round of environmental audits are being completed for comparison purposes in order to interpret the audit data for enhancing their compliance and the development of their EMS. The OSM conducted EMS training classes for its 20 collateral duty safety officers and drafted an EMS policy which should be released shortly.

**U.S. Geological Survey (USGS):** The USGS includes resources for EMS as part of the overall safety, health, and environmental budget request. For FY 2005, 110 environmental audits were performed. The USGS developed a web-based inspection and abatement system to allow all field organizations to conduct self-audit of general environmental compliance, inclusive of tracking findings through final abatement action. The USGS has a total of 27 designated appropriate facilities. All of these designated appropriate facilities issued a facility-level EMS policy and have conducted EMS training along with ongoing EMS implementation. The USGS has deployed EMS awareness training within its web-based EMS software. The EMS training includes 3 modules (EMS Overview, EMS Design, and EMS implementation). The USGS developed an EMS Self-Declaration Protocol for use in its designated appropriate facilities. The use of this protocol will enhance USGS annual EMS self-audits and lead to self-declaration of USGS facilities. EMS status assessments will be automated to enhance EMS implementation and meet scorecard requirements.

**U. S. Department of the Interior  
Calendar Year 2005 Progress Report  
on the Implementation of Executive Order 13148  
“Greening the Government through Leadership in Environmental Management”**

The U.S. Department of the Interior (DOI) is the nation’s principal conservation agency. Our mission is to protect America’s treasures for future generations, provide access to our Nation’s natural and cultural heritage, honor our trust responsibilities to American Indians and Alaska Natives and our responsibilities to island communities, conduct scientific research, provide wise stewardship of energy and mineral resources, foster sound use of land and water resources, and conserve and protect fish and wildlife. The work we do affects the lives of millions of people; from the family taking a vacation in one of the national parks to the children studying in one of our Indian schools.

The DOI is a large decentralized agency with over 80,000 employees and 180,000 volunteers located at approximately 2,400 operating locations across the United States, Puerto Rico, U.S. territories and freely associated states. The DOI accomplishes its responsibilities on a \$16.4 billion total annual budget and manages approximately 500 million acres of surface land, or about one-fifth of the land in the United States including:

- 261.7 million acres managed by the Bureau of Land Management (BLM);
- 94.3 million acres managed by the Fish and Wildlife Service (FWS);
- 84.6 million acres managed by the National Park Service (NPS);
- 8.7 million acres managed by the Bureau of Reclamation (WBR) associated with reclamation projects;
- 56 million acres managed by the Bureau of Indian Affairs (BIA);
- the management of mineral resources in approximately 1.76 billion acres of the Outer Continental Shelf by the Minerals Management Service (MMS);
- over 190,000 acres of abandoned coal mine sites reclaimed through the Office of Surface Mining’s (OSM) Abandoned Mine Land Program; and,
- groundwater and surface water studies conducted in all states by the U.S. Geological Survey (USGS).

The DOI consists of many Bureaus and Offices with different missions that serve a diverse customer and public base. Within DOI, managing the environment is a critical component of our mission of being good stewards of our Nation’s natural and cultural resources. In keeping with our citizen-focused stewardship role, sound management practices are the key to success, and lead to more efficient and effective Government practices in support of the President’s Management Agenda. This report reflects both our stewardship role and support of the President’s Management Agenda. In keeping with this role, our Bureaus and Offices have incorporated many innovative practices in their respective environmental management programs.

This report is consistent with the Calendar Year 2005 (CY) E.O. 13148 guidance provided by the U.S. Environmental Protection Agency (EPA) and is divided into two main areas: (a) Progress of Departmental Offices and (b) Progress of Departmental Bureaus on E.O. 13148 implementation. To facilitate questions raised in the 2005 guidance, responses by Bureaus and Offices are grouped under major headings. However, since Bureau and Office programs differ, their responses will reflect those differences. The Appendix contains supplemental information including a list of the DOI EMS Council members who may be contacted for further information

## **PROGRESS OF DEPARTMENTAL OFFICES – E.O. 13148 IMPLEMENTATION**

### **OFFICE OF ENVIRONMENTAL POLICY AND COMPLIANCE**

The Office of Environmental Policy and Compliance (OEPC) develops policy, coordinates, and oversees Department-wide compliance with a wide variety of environmental statutes, executive orders, and regulations. OEPC provides a coordinated and unified approach and response to environmental issues that affect multiple Bureaus in order to ensure that DOI speaks with one voice on those issues. Also, OEPC provides independent environmental and technical advice to the Secretary of the Interior and other Departmental officials.

These missions are met nationwide through the OEPC Headquarters and Regional Offices. The Headquarters Office located in Washington, D.C. is organized into four teams – Natural Resources Management, Environmental Management Integration, Natural Resources Trust and Response, and the Environmental Cleanup and Liability Management. The OEPC has eight Regional Offices located in Boston, Philadelphia, Atlanta, Denver, Albuquerque, Oakland, Portland, and Anchorage. Each Regional Office is headed by a Regional Environmental Officer who reports to the Director, and is responsible for all environmental functions within the assigned region. Additional information may be obtained from the OEPC website at: <<http://www.doi.gov/oepc>>.

### **Reporting Elements Cited in Section 307 of E.O. 13148.**

The OEPC does not operate any facilities; therefore, OEPC does not have anything to report under sections 502 (toxic chemical release reduction goals), 503 (reduction goals for specified chemicals), and 505 (use of ozone-depleting substances) under E.O. 13148. The Class I Ozone Depleting Substances (ODS) policy is the responsibility of DOI's Office of Acquisition and Property Management and outlines a plan to phase out all acquisition of Class I ODS by December 31, 2010 (see under the Office of Acquisition and Property Management section).

### **Environmental Management Systems.**

To assist in DOI-wide Environmental Management System (EMS) implementation, a DOI EMS Council was established under the provisions of 515 Department Manual (DM) 4 and formally chartered under Environmental Compliance Memorandum (ECM) 03-02. (The ECM is publicly available at: <<http://www.oepc.gov/ecms.html>>). The Council is chaired by OEPC. The Council makes recommendations to senior DOI management on EMS implementation and provides a

forum to raise EMS crosscutting issues that affect Departmental Bureaus and Offices. Furthermore, the Council promotes common efficiencies and sharing of resources in order to foster environmental stewardship throughout DOI. Various EMS resources and guidance documents have been issued to the Bureaus and are available on the Greening the DOI website at: <<http://www.doi.gov/greening>>.

DOI's EMS Self-Declaration Protocol for Appropriate Facilities is posted on the Office of the Federal Environmental Executive website at <<http://www.ofee.gov>>. The DOI EMS Self-Declaration Protocol for Appropriate Facilities was developed by the DOI EMS Council and issued as Environmental Compliance Memorandum (ECM04-2) issued on July 7, 2004. The Environmental Compliance Memorandum is part of DOI's directive system and was communicated to all Bureaus and Offices and through the DOI EMS Council. It may be found on the Office of the Federal Environmental Executive website at: <<http://www.ofee.gov>>. Several National Parks were certified under ISO 14001 and others were enrolled in EPA's National Environmental Performance Track Program.

Environmental auditing and EMS performance goals and measures were developed by the DOI EMS Council and are implemented and linked to overall Departmental management excellence in the DOI Strategic Plan. For CY 05, there are 484 designated "appropriate facilities" as defined under E.O. 13148 and as reported by DOI Bureaus and Offices (see Appendix).

For FY 2005, both environmental auditing and EMS scorecards were developed. These goals and measures are reflected in DOI's Annual Accountability Report that may be found at the following website: <<http://www.doi.gov/pfm>>. The DOI fully supports EMS implementation at all its appropriate facilities and the training of its senior managers and other appropriate personnel. However, resource constraints prevented DOI from meeting the December 31, 2005 deadline. Various EMS resources and other guidance documents (pollution prevention, green procurement, recycling, electronics disposal, etc.) have been made available on the Greening the DOI website at: <<http://www.doi.gov/greening>>.

## **1. Resources.**

OEPC in coordination with DOI's Office of Budget, developed criteria for DOI's FY 2008 Budget Formulation Guidance to facilitate Bureaus funding request specifically for EMS implementation. The criteria provided funding request guidance to Bureaus to address environmental audit corrective actions at facilities and for EMS program implementation. Within OEPC, the Environmental Management and Integration Team has four employees involved with environmental compliance management. The OEPC has no line item budget and is funded principally through the budget of the Office of the Secretary. Therefore, EMS implementation must compete along with other equally important statutory requirements. OEPC has one full-time FTE devoted to environmental auditing and EMS implementation. Section 4.8 (E) in DOI's EMS policy (515 DM 4) requires Heads of Bureaus and Offices to ensure that adequate resources and funding are available for EMS implementation. Section 4.8 (F) requires that program managers (e.g., area/field office managers, district

managers, refuge managers, park superintendents) ensure EMS implementation and to request funding through their respective Bureau budget process. The Budget Fact Sheet on EMS developed by the E.O 13148 Workgroup was distributed to both program and budget offices.

## **2. EMS Guidance.**

At the Department level, the DOI EMS Council is the principle means to provide and share technical information on various environmental procedures and provide environmental training for senior managers and staff of DOI Bureaus and Offices. Additionally, OEPC sponsors a Department-wide environmental conference that offers both staff and senior level management opportunities to receive technical information and training in a variety of environmental areas. Although DOI has not held an environmental conference since 2003 due to budgetary constraints, we plan to work through the DOI EMS Council in sponsoring such a conference in 2008. In addition, training in various environmental areas, including EMS was offered and supported by EPA headquarters and regional personnel and representatives from the Office of the Environmental Executive. Some Bureaus and Offices have developed environmental compliance and EMS training for their senior-level management. Such training is described under specific Bureau and Office sections of this report. The frequency of training depends upon the level of funding available and the individual Bureaus are responsible for training of their personnel. The OEPC does occasionally sponsor special sessions where outside experts may discuss various environmental issues.

## **3. Response to the President's Management Council (PMC) Compliance Management Improvement Initiative.**

The OEPC is committed to the PMC Compliance Management Improvement Initiative (PMCCMII). The Secretary has repeatedly emphasized that compliance with environmental laws and regulations remains a high priority for DOI. The policy (Departmental Manual, Part 515, Chapter 2, "Environmental Auditing") requires environmental auditing of all DOI facilities. The policy is publicly available at the following Internet website address:  
<<http://www.elips.doi.gov/elips/release/3172.htm>>.

Each Bureau and Office is responsible for developing and implementing its respective environmental auditing program. However, as part of DOI's annual audit reporting requirement, Bureaus provide summary information on their auditing programs and activities to OEPC. Such information includes the cumulative number of facilities audited to date, number of facility audits scheduled for the next Fiscal Year (FY), major audit issues identified in the reporting year, and the total cost of the Bureau audit program for the reporting FY. The OEPC then prepares a DOI Summary of the FY Annual Report on Bureau Environmental Auditing Programs and Activities. Summary reports were completed for FY's 1999-2005. For FY 2005, the Bureaus reported a total of 3,479 facilities, with a total of 576 environmental audits performed. In support of the PMCCMII, and as part of the OMB Environmental Stewardship Scorecard process, DOI commits to include:

- electronics stewardship and green purchasing in DOI environmental audit and EMS programs,
- adopt Interagency E.O. 13148 Working Group metrics, and
- monitor overall Bureau environmental compliance using EPA's online compliance tracking system (OTIS).

### **Award Recognition Programs.**

The OEPC administers both the White House Closing the Circle Award for DOI and the DOI Environmental Achievement Award. The DOI Environmental Achievement Award recognizes exceptional environmental achievements that highlight conservation of resources through cooperation, consultation and communication within Bureaus or Offices, either by individual employees or teams, or by contractors to a Bureau or Office. The Award helps implement: DOI policy for comprehensive waste management for its lands and facilities (518DM 1); Executive Order (E.O.) 12856, Federal Compliance With Right-To-Know Laws and Pollution Prevention Requirements; E.O. 13101, Greening the Government Through Waste Prevention, Recycling, and Federal Acquisition; and E.O. 13148, Greening the Government Through Leadership in Environmental Management, and the Strategic Plan for Greening the Department of the Interior Through Waste Prevention, Recycling, and Federal Acquisition.

Areas of recognition include: Waste/pollution prevention, recycling, environmentally preferable and affirmative procurement, facility environmental excellence, EMS, environmental stewardship, and education and outreach. Since its inception, in 1995, a total of 80 awards were given.

Other environmental and conservation improvement initiatives are considered as well. An Awards Committee consisting of representatives of DOI Bureaus and Offices review nominations that are submitted and perform the selection of award recipients. A total of 11 recipients were selected for the DOI Environmental Achievement Award in 2005 and there were three DOI recipients of the White House Closing the Circle Award in 2006. Information on the recipients of both awards may be obtained at the Greening Interior website: <http://greeninginterior.doi.gov/awards/index.html>.

### **OFFICE OF ACQUISITION AND PROPERTY MANAGEMENT**

#### **Reporting Elements Cited in Section 307 of E.O. 13148.**

The Office of Acquisition and Property Management (PAM) does not operate any facilities; therefore, DOI's does not have anything to report under sections 502 (toxic chemical release reduction goals), 503 (reduction goals for specified chemicals), and 505 (use of ozone-depleting substances) under E.O. 13148. The PAM issued policy guidance on May 27, 1993, in a DOI

Acquisition Policy Release (DIAPR) 93-18. The policy calls for taking action to minimize the procurement of ozone depleting substances (ODS) by informing engineering and environmental

staffs of E.O.12843 requirements; initiating program review of standards and specifications to remove ozone-depleting substances; and tracking the progress of Bureaus and Offices.

A policy memorandum was issued in October 1995, apprising property managers about the chlorofluorocarbon and "Halon" turn-in program for maintaining reserves by the Defense Logistics Agency of the Department of Defense. Under DIAPR 97-2, issued December 2, 1996, DOI established policy to maximize the use of alternatives to ODS in specifications and contracts in accordance with Federal Acquisition Regulation (FAR) clause requirements. FAR 52-223.11, "ODS" and FAR 52-223-12, "Refrigeration Equipment and Air Conditioners" are required clauses for inclusion in contract requirements.

### **Alternative Fuel Vehicle Acquisition.**

Over the past decade, the DOI has consistently been one of the Federal Government's most successful programs, increasing the number of Alternative Fuel Vehicles (AFVs) in the motor vehicle fleet from about 200 AFVs in FY 1998 to approximately 2,600 in the current year. In FY 1996 and 1997, DOI fell short of the Energy Policy Act (EPACT) of 1992's AFV acquisition requirements due to the limited number of AFVs on the market, fueling and infrastructure constraints, and the costs associated with operating AFVs. The guidance outlined in EPACT requires that 75% of new light-duty vehicles leased or purchased in Metropolitan Statistical Areas (cities with populations of 200,000 or more) be AFVs. Starting in FY 1998 and in every subsequent reporting year, DOI has met or exceeded the EPACT requirement and the goals outlined in Executive Order (EO) 13149, *Greening the Government Through Federal Fleet and Transportation Efficiency*. The Department anticipates achieving the AFV acquisition goal for FY 2006 for the eighth consecutive year.

This success can be attributed to DOI's commitment to environmental stewardship, increased AFV production by vehicle manufacturers, development of bureau fleet management plans that assist bureaus with achieving targeted goals, growth in the fueling infrastructure, and a creative financing arrangement with General Services Administration (GSA). Individual Bureau goals and requirements are also compliant with EPACT and EO 13149.

AFVs are important to DOI's energy strategy and help reduce the Nation's dependence on foreign crude oil. The rising costs of conventional fuel, coupled with the unrest in the global oil industry have made Interior's policies and guidance on AFV use a key issue. AFVs offer more environmentally-friendly burning fuel vehicles than conventionally fueled vehicles.

DOI continues to report fleet information into the Government-wide Federal Automotive Statistical Tool (FAST), which is an important management system for reporting AFV inventory, acquisition information and alternative fuel consumption. DOI will continue to work with the Department of Energy and GSA to strengthen the FAST reporting system.

## **Computer Demanufacturing.**

DOI facilities dispose of electronics in a safe and environmentally compliant way. In 2001, DOI and the Bureau of Prison's Federal Prison Industries (FPI) signed a Memorandum of Understanding (MOU) that provides recycling and demanufacturing service for DOI's excess unserviceable and obsolete electronic equipment nationwide. Under this MOU, which remains in effect, FPI is charged with dismantling and recycling transferred electronic equipment and components, and removing and disposing of hazardous substances, material and wastes in accordance with Federal, state and local laws and regulations. Additionally, in 2004, DOI signed along with 11 other Federal Agencies, a MOU to promote Sustainable Environmental Stewardship of electronics assets. The MOU commits agencies to develop and promote common strategies for using environmental sustainable technologies and practices improve the quality, performance and environmental management of Federal electronic assets throughout their lifecycle.

In support of sustainable environmental stewardship of electronics, DOI established several Departmental Indefinite Delivery Indefinite Quantity for computers and peripherals. The vendors shall provide details on their optional "take back" or recycling service that meets EPA's "Plug-In To eCycling: Guidelines for Materials Management." The purchaser must be able to a) use the "take back" service for the new computer or b) to recycle legacy equipment.

## **NATIONAL BUSINESS CENTER (NBC)**

### **Reporting Elements Cited in Section 307 of E.O. 13148.**

The NBC addressed reduction goals for Federal agency release of toxic chemicals when it awarded a multi-year custodial contract in 2004, which uses environmentally-safe and -healthful custodial products in the Interior Complex. Chemical cleaning products used under this contract meet or exceed mandatory criteria for reducing the release of toxic chemicals. Contract specifications include the following:

- Must not be a hazardous waste (when disposed of),
- Must not be packaged in an aerosol container,
- Must not contain any probable or known carcinogens,
- Must not contain any ingredients that are designated as "Toxics of Concern" to the Chesapeake Bay,
- Minimize use of dyes and fragrances, and
- Minimize skin, eye, and respiratory irritation.

Additionally, all paper products must be manufactured without use of elemental chlorine for dyeing and bleaching.

NBC also recycles computers, Ni-Cad batteries, carpet and padding, toner cartridges, fluorescent tubes, transparencies, and computer disks. Also, NBC is working with GSA to evaluate environmentally preferable products during the Main Interior Building Modernization Project

which is a U.S. Green Building S LEED-EB pilot project. Work being accomplished as part of this project will earn credit toward building certification if/as permitted by the LEED-EB pilot program.

The NBC replaced all of the three Main Interior's Building chillers with R-134-A, which is an HCFC (hydro-chlorofluorocarbon) refrigerant and much more environmentally-friendly than a CFC refrigerant.

The custodial contract for the Interior Complex requires the use of environmentally-friendly products including low- or no-VOC cleaning compounds and chemicals. NBC banned the use of aerosol containers in the Interior Complex. Only pump sprayers can be used to dispense cleaning chemicals. Also, NBC prohibited the sale of products in aerosol containers at the Main Interior Building office supply store.

## **Environmental Management Systems.**

### **1. Resources**

The NBC requested \$175K for in the FY 2006 Departmental Budget request. While the Department was not able to fund NBC's request; they were able to divert funding to perform an environmental audit in the Interior Complex. The need for resources is recognized, but funding is not available. The NBC continues to request funds from the Department for EMS implementation. NBC has one person working part-time with the eight directorates to implement EMS. Until resources can be freed, NBC may not be able to fully implement an EMS program.

### **2. EMS Guidance.**

The NBC issued an Environmental Management Policy on September 16, 2005. It can be found at [http://www.nbc.gov/Environmental\\_Management\\_Policy.pdf](http://www.nbc.gov/Environmental_Management_Policy.pdf).

NBC is proactively working with all directorates regarding pollution prevention, recycling, green procurement, conservation of utilities, and use of biobased products. This will be accomplished after we complete our environmental audits and implement an EMS. The total number of appropriate facilities is four. NBC plans to use the EMS Self-Declaration Protocol guidance issued by the Department and issuing an NBC EMS Self-Declaration Protocol in CY 2009.

## **PROGRESS OF DEPARTMENTAL BUREAUS – E.O. 13148 IMPLEMENTATION**

### **BUREAU OF INDIAN AFFAIRS (BIA)**

#### **Reporting Elements Cited in Section 307 of E.O. 13148.**

BIA's use of toxic chemicals and associated releases of toxic chemicals continue to be limited. BIA facilities that are required to report requirements under Section 311 (TIER I and II) and Section 313 (Toxic Release Inventory) are minimal.

BIA facilities are audited under the Bureau-wide Environmental Management Audit Program (EMAP) against EPCRA Compliance and Green Procurement criteria. Potential toxic substance reductions are identified during EMAP audits and noted in the associated audit report. Best Management Practices (BMPs) are recommended on a facility-by-facility basis to purchase products with reduced toxicity.

Toxics reduction at BIA facilities is also being handled as part of a comprehensive Bureau-wide Greening Program. The 2005 strategy to address Section 502 was not fully achieved but additional progress is anticipated for completion in 2005. Components of this strategy are as follows:

- Division of Environmental and Cultural Resources Management (DECRM) will conduct a BIA-wide survey to identify those facilities that report under EPCRA and obtain information on use of toxic chemicals within the BIA.
- DECRM will analyze this information and identify potential toxic chemicals for targeted substitution and reduction.
- DECRM will report results to the Environmental Management System (EMS) and Green Procurement Workgroups.
- Based upon direction from the Workgroups, DECRM will develop and issue field guidance on reduction of these targeted substances, if any. Conformance with this field guidance will be monitored through the BIA EMAP and green procurement data calls.

The BIA continues to assess the use of Class I ODSs at Bureau facilities during EMAP Audits. Class 1 ODSs are primarily used in halon fire suppression systems for critical file storage facilities. Recommendations to replace or retrofit Class I ODS systems are provided on a facility-by-facility basis.

### **Environmental Management Systems.**

The BIA has developed draft revised and updated policies in Part 59 of the Indian Affairs Manual (IAM). These revisions include a chapter dedicated to EMS as well as chapters that address environmental management policies, authorities and responsibilities, environmental compliance, and others. The revised policies are currently undergoing final review and revision by the BIA EMS workgroup prior to submission to the BIA Policy office for their review.

Currently, release of the latest IAM is anticipated in Fiscal Year (FY) 2006. It should be noted, promulgation of the revised IAM has been held up in part to reorganization efforts by the BIA over the last several years which have limited the ability to finalize organizational roles and responsibilities.

To assure that management commitment to the BIA's EMS efforts is communicated Bureau-wide while the IAM goes through the necessary review and approval process, a memorandum on the bureau's intentions relative to EMS and associated environmental management responsibilities is being prepared.

The BIA EMAP has EMS criteria as part of its protocol (i.e., EMAP Operating Guide). The EMAP also includes Green Procurement and NEPA compliance in its scope. Pollution prevention opportunities are also addressed in the audit protocol. The BIA has not developed an EMS Self Declaration Protocol. The Self Declaration Protocol will be integrated into the Bureau EMS Indian Affairs Environmental Management System Handbook currently under development (see below). The Protocol is expected to be completed in FY 2006.

## **1. Resources.**

The BIA has not provided any dedicated funding to facilities for the purpose of developing EMSs. The BIA strategy for EMS development and implementation is focused on funding at the Bureau and Regional level to develop and deliver training, EMS development assistance, and EMS tools to facilities rather than directing funds to these field locations. This provides broader EMS support with scarce resources. This strategy is consistent with the BIA philosophy that the primary resource needed at the facility level for EMS development and implementation is person hours rather than funds. For BIA, a successful facility-level EMS is a grass-roots, people-driven process.

The BIA recognizes the need to fund environmental projects to support (but not develop) the facility-level EMS. As such, BIA has established various budget mechanisms to fund environmental projects at the field level such as environmental remediation and audit corrective action. Some of these projects include aspects that can cultivate a management system approach and foster development and implementation of EMS elements such as operational controls (e.g., one-time/baseline plans and procedures and emergency response planning).

As noted above, the BIA EMS strategy focuses on providing resources other than funding to facilities to foster development and implementation of EMS. Activities to support EMS development at the facility level will include development of an EMS toolkit, training and on-site EMS coaching as an add-on to baseline audits and through follow-up activities.

Budget requirements including contractor support and internal resources (e.g., person hours contributed by DECRM staff and Regional Environmental Scientists) were in the FY 2005 budget request. However, only the contractor EMS budget was specifically identified ~~tagged~~ as EMS-related.

Funding for contractor support to assist the BIA in EMS development and implementation is as a line item. BIA Regional Environmental Scientists and other staff time for EMS is accounted for as part of the annual planning process but is not specifically identified as EMS-related.

The following roles and responsibilities related to EMS are defined in the draft IAM Part 59, Chapter 2, Environmental Management Systems:

- Chief, Division of Environmental and Cultural Resources Management, Office of Management Support Services.

- Convene and direct an Indian Affairs EMS Workgroup to assist in Bureau-wide EMS development;
- In consultation with the EMS Workgroup, develop and maintain the Indian Affairs strategy and plan for development and implementation of Indian Affairs EMSs including consultation with Bureau representatives, establishment of criteria for identifying appropriate locations and offices for a formal EMS, identification of Bureau EMS elements and EMS implementation;
- Document and maintain the Indian Affairs EMS Handbook;
- Provide assistance to regions, offices and locations in EMS development and implementation;
- Conduct Bureau-wide EMS training and communication;
- Oversee development, implementation and maintenance of the Central Office EMS;
- Develop and administer a Bureau EMS quality assurance program, monitor and report to Bureau managers, on Bureau-wide EMS activities and performance.
- BIA EMS Workgroup Members.
  - Provide guidance to the Chief DECRM, in the development and implementation of the BIA EMS including participation in strategic planning, policy development, review of guidance materials and procedures, communication, training development and delivery.
- Regional Environmental Scientists.
  - Provide EMS guidance and assistance to location and office managers and staff within their region;
  - Lead the development and maintenance of the Regional EMS; and
  - Monitor and report on Regional EMS activities and performance;
- All Indian Affairs Managers.
  - Lead, coordinate, provide resources for, and actively endorse the establishment, implementation and maintenance of an appropriate EMS or EMS components within their area of responsibility as defined in Indian Affairs guidance.
- All Indian Affairs Employees.
  - Comply with applicable Indian Affairs procedures, and documented responsibilities that relate to environmental management systems.

Note that all Indian Affairs Managers applies to managers at all levels of the BIA organization (i.e., Central Office to facility level) and throughout the Bureau (i.e., Office of Indian Education Programs, Office of Law Enforcement Services, and Balance of the Bureau). Specific roles and responsibilities may be revised and refined based on changes in EMS planning and the ongoing reorganization of BIA. These will be reflected in both EMS memorandum and the final IAM.

DECRM has had success with its EMS Workgroup which has had broad and enthusiastic participation by Bureau personnel. Workgroup membership has a diverse group of stakeholders including OIEP and OLES representatives; Superintendents and facility managers; OFMC; Regional Environmental Scientists; DECRM and others. This facilitated the Bureau's development of a strategy for EMS development and implementation that is realistic and that should reflect account for the great diversity and varied issues facing in the Bureau.

There have been a number of challenges in developing the BIA EMS. Several of the most significant challenges are outlined below:

Level of Environmental Sophistication. Paramount among the challenges to establishing EMS at BIA facilities is the existing level of environmental management present at field locations. Historically, there has not been significant environmental training or assistance to personnel at BIA facilities. Many facility staff are not aware of core compliance requirements. BIA is rapidly responding to these needs: BIA is currently working to complete all its baseline environmental audits and in the last several years various training and assistance tools have been developed and provided.

BIA is developing an EMS strategy that builds on the foundation of its audit program and achieving compliance using sustainable, pollution prevention approaches as a top priority. Through the audit program, BIA will introduce EMS concepts and procedures at the facility level gradually. EMS assistance will be provided based on the identified level of the facility performance established during the course of each audit. EMS assistance will first target the establishment of EMS elements that provide the most benefit, such as standard operating procedures (SOPs) for common compliance issues and environmental impacts (e.g. universal waste, fuel storage). More sophisticated elements of the system will be introduced as environmental management matures at the facility level and personnel gain confidence in managing their facility's compliance and environmental aspects. This strategy means the overall BIA EMS will take longer to implement but will be better received, more sustainable and deeply ingrained over the long-term.

Bureau Reorganization. The Bureau has been analyzing and testing various organizational changes at the Central Office and regional level. The reorganization has slowed progress. Activity in this area has begun to stabilize.

Bureau Variability. BIA facilities have great variability, including schools (elementary to colleges), detention centers and police forces, operations and maintenance shop complexes, large irrigation projects, and office-based operations. The Bureau must consider this great variability in developing an EMS that is a right-fit and that is useful and practical for these varied facilities. To address this variability, BIA undertook additional EMS pilots at a school and a detention center (or other suitable OLES facility) to develop templates tailored for these types of facilities. (Pilot EMSs are already underway at agency operations and maintenance facilities.)

BIA Ownership versus Operation. A significant portion of BIA facilities are operated under contract or grant to Tribes. Many of these facilities have some of the most significant aspects and impacts on a Bureau-wide basis. The BIA is challenged to develop an EMS that will address these facility operations in a manner that is effective and sensitive to Tribal issues. BIA cannot mandate these entities to develop an EMS but plans to encourage the development of EMS within Tribal operations and will make EMS development tools available to them. BIA will also strongly encourage the incorporation of provisions to require adoption of EMS components into contracts and grants involving BIA-owned facilities, and may require this in some circumstances.

## **2. EMS Guidance.**

BIA has developed various EMS training materials for use in Bureau EMS workgroups and conferences. BIA also developed EMS audit criteria as part of the EMAP. In addition, BIA has developed various EMS operational control guidance including SOPs for key facility-level activities and model environmental program plans.

BIA developed a model EMS Plan that has been used on a pilot-basis to document facility-level EMSs. This plan is currently under review and is being updated based on input from the BIA EMS workgroup and analysis of EMS pilot activities.

The BIA is developing a comprehensive Environmental Management System Handbook to provide detailed guidance and procedures to implement the BIA EMS in accordance with the strategy outlined above. The Handbook will be completed in FY 06.

EMS training materials were provided through on-site workgroup meetings and conferences. Model SOPs and plans were integrated into an Environmental Management Assistance Tool (EMAT) which was distributed at various training sessions and during EMAP audits. Plans are underway for broader distribution both through a CD-ROM and intranet, with full Bureau-wide distribution.

The model EMS Plan was not widely distributed but shared with pilot facilities and used to document facility EMS's at these pilot locations.

The BIA Environmental Management Systems Handbook currently under development will also be provided via CD and intranet along with the model EMS Plan and templates.

EMS training has not occurred for central office or regional senior managers. A briefing for senior central office managers is anticipated in FY 06 following the development of the BIA Environmental Management System Handbook. DECRM recently developed and piloted Environmental Management training in one BIA region for BIA facility managers and superintendents. The training focused on the BIA EMAP, audit corrective action process and compliance assistance tools and EMS approaches to solving environmental problems. Several additional trainings in other regions are anticipated in 06. DECRM will continue to explore new ways and find additional opportunities to train senior managers on EMS and other critical environmental topics and will augment the existing strategy as appropriate. No outside training resources were utilized or are identified for use in EMS training at this time.

BIA continues to conduct multimedia environmental audits under the BIA EMAP. Fifteen "agency" audits were conducted in FY 2005 including 66 individual locations throughout the U.S. These locations included BIA OIP (i.e., agencies), OIEP (i.e., schools) and OLES (i.e., detention centers and police departments). The BIA also conducted an additional 39 fast tracked OLES audits. An EMAP plan is complete and is being implemented. The Plan calls for the completion of an additional 15 audits including approximately 50 facilities. Additional facilities may be audited under special circumstances.

The BIA EMS workgroup is in the process of developing an updated definition of appropriate facilities based on the BIA reorganization and other factors. A list of facilities, based on these revised criteria will be completed. The revised process for defining appropriate facilities identified during the May EMS Workgroup Meeting is currently being documented and will be provided in the BIA Environmental Management Systems Handbook.

With the exception of several pilot facilities, the process for identifying aspects and impacts and determining measurable objectives and targets has not been formally instituted within BIA. However, the BIA has completed environmental audits at over 193 of approximately 348 facilities. Findings associated with these audits were informally defined as significant aspects and impacts at these facilities. The closure of findings associated with these audits are defined as objectives for these facilities with targets established as part of their corrective action plans.

There is no formal process instituted to establish complete environmental management programs at BIA facilities. Facilities that have had environmental audits may have developed corrective action plans to address environmental audit findings. However, these plans do not constitute complete environmental management programs in the context of EMS.

BIA will continue efforts to further develop, pilot, and begin to implement its EMS process in FY 06. Several additional EMSs are anticipated at BIA facilities in FY 06.

BIA facility-level awareness training has not been conducted at this time. DECRM has recently piloted environmental management training in one BIA region that includes EMS awareness. This training, in conjunction with other compliance assistance training materials provided as part of the BIA EMAT, will provide tools for BIA managers to implement facility-level training in the future.

Facility-level policies have not been developed within the Bureau. Guidance will be provided to facility-level managers using the BIA Environmental Management System Handbook which is currently under development.

BIA has provided EMS awareness during audits, and more recently through a pilot environmental management training in one region, which was attended by facility managers and superintendents. It is anticipated that additional environmental awareness trainings will be conducted Bureau-wide.

## **BUREAU OF LAND MANAGEMENT (BLM)**

### **Reporting Elements Cited in Section 307 of E.O. 13148.**

The BLM continues to report the use of fire retardant, which is mixed on a batch basis as an aqueous solution and applied to wildland fires. The active constituents are ammonium sulfate and/or ammonium phosphate. The amount of fire retardant released to the environment is

variable and dependent on the fire season activity. Although, there are currently no viable substitute products for use at this time, BLM continues to be active in searching for less toxic fire retardants.

The BLM is anticipating a decrease in use of fire retardant because of measures taken in the national fuels reduction program. The need for fire retardant should continue to decline as the federal government and its state partners reduce heavy fuel loads arising from past disruptions of natural fire cycles and other land management practices. Additionally, the use of mechanical thinning and controlled burning reduces the intensity and severity of wildland fires. The primary fuels reduction efforts are targeted in wildland-urban interface areas and the elimination of heavy fuel loads in these areas reduces the risks to communities and results in a corresponding decrease in fire retardant applications. Additionally, BLM continues to explore options to eliminate or reduce ferric cyanide in the fire retardant. Ferric cyanide is currently used as a corrosion inhibitor in tank storage and tanker operations.

The BLM continues to work closely with the Department's Office of Environmental Policy and Compliance to identify and implement reductions in the use of specified chemicals. The Bureau will include goals for the reduction of specific chemicals in guidance issued to field activities to assist them in completing the annual Resource Conservation and Recovery Act (RCRA) report using the Department's database reporting tool.

The BLM continues to incorporate sustainable design features in new construction to the greatest extent possible. A number of features reduce air conditioning load and consequently the use of coolants and refrigerants. These include direct/indirect evaporative cooling, interior/exterior light shelves on south windows, Lo-E glazing, increased building shell insulation, and systems commissioning. As an example of continuing ODS reduction and substitution efforts, the humidification system at the Anasazi Heritage Center in Colorado is used to protect priceless Native American artifacts which are stored and displayed at the facility. The Center preserves approximately 2 million artifacts and records for current and future researchers and historians. The humidification system consists of a boiler and centralized air conditioning and heating system with duct work. The chiller uses R-22, chlorodifluoromethane, which is the most environmentally friendly refrigerant available for this application.

The BLM continues to incorporate energy efficiency, conservation, and environmental preferable purchasing provisions into policies, plans, operations, and activities. For example:

- Green procurement policies, guidance, and case studies are posted on BLM's Acquisition Internal Homepage.
- Employees holding government credit cards receive comprehensive procurement training and refresher courses which include environmental preferable purchasing requirements.
- BLM's Division of Engineering and Environmental Services, in coordination with Property Management and Procurement is developing a Greening strategy for incorporating green principles in all of the Bureau's activities.

- BLM has formed an Energy Conservation Working Group, whose primary purpose is to coordinate energy conservation efforts throughout the Bureau's field activities.
- Energy efficiency, water conservation, recycling, and green cleaning clauses are included in all new space lease agreements and service contracts to the greatest extent practicable.
- Photovoltaic and other renewable energy systems are used to generate electricity for security lighting, water pumping, weather/water monitoring, and other power needs at off-grid locations such as campgrounds, visitor contact stations, fire stations, and communication sites.
- BLM offices and centers prepare space leasing and fleet plans to:
  - adjust for changing program needs,
  - maximize the cost effectiveness and efficient use of space, and
  - reduce fleet size and vehicle sizes.

## **Environmental Management Systems.**

A formal Environmental Management System (EMS) continues to be developed. Many EMS elements are integrated in BLM's Compliance Assessment - Safety, Health, and the Environment (CASHE) program. Findings, root causes, and corrective actions are tracked, used to identify systemic problems, and evaluated against Bureau-wide performance goals. In addition, the BLM offers a curriculum of in-house environmental compliance and hazardous materials management training for technical specialists and managers. BLM's EMS coordinator conducted a number of EMS training sessions with key Washington Office and State personnel to familiarize them with the elements and benefits of an active EMS. As reported in the 2004 report, the BLM expects to identify appropriate facilities in FY 2006, upon completion of the two scheduled pilots.

### **1. Resources.**

During the 2005 reporting period, BLM filled a critical environmental engineer position in the Washington Office to assist in the development and implementation of the Bureau's EMS. Additional funding was provided to brief facility managers on EMS requirements and contracts were put in place or modified to provide technical support for gap analysis and identification of aspects and impacts at appropriate facilities within the Bureau. Briefings have been conducted and more are planned in order to insure that management is aware of the resource requirements necessary for EMS implementation. BLM is funding two pilot projects for EMS development and implementation in FY 2006.

### **2. EMS Guidance.**

The Bureau is working to implement an EMS at two appropriate facilities in 2006 and will create written guidance which incorporates lessons learned from those pilots. The Bureau intends to

issue two Instruction Memorandums (IMs). The first IM will establish the BLM's Environmental Management System (EMS) policy. The second IM commits BLM to develop and implement EMS using the two pilot projects. Lessons learned from these pilots will be used to improve EMS implementation throughout the rest of the Bureau. The EMS policy and pilot IMs are expected to be issued in 2006.

Extensive briefings and training of BLM senior managers has resulted in several revisions to the draft EMS policy. As a result, the expected date that was reported in the 2004 report (December 2005) has been revised to 2006. These revisions will ensure that EMS is fully aligned with a new BLM National Monitoring Strategy currently in development. A briefing for the Director will be scheduled for 2006, prior to the signing of the EMS Policy statement. As reported in the 2004 report, BLM expects to develop an EMS self-declaration protocol by the end of FY 2006.

EMS manuals and procedures will be developed upon completion of the pilot programs. BLM expects all appropriate facilities to create a facility specific EMS implementation manual which describes the management system.

EMS awareness training will be provided for all appropriate BLM staff who participate in the pilot EMS implementation. This initial training will be provided in FY 2006. EMS awareness training will be provided throughout the Bureau to appropriate staff as EMS is developed and implemented at appropriate facilities.

No BLM facilities have completed the self-declaration. The first two facilities to implement an EMS in FY 2006 would be expected to complete self-declaration in FY 2007.

### **3. Response to the President's Management Council (PMC) Compliance Management Improvement Initiative.**

The BLM's Environmental Management Information System continues to be improved. Work is underway to merge the Abandoned Mine Land and Site Contamination System modules into a single database in an effort to more easily report and track environmental liabilities. Development of the CASHE and Safety Management Module (CSMM) is scheduled for completion by the end of FY 2006. The CSMM will automate the documentation of facility compliance findings. It will also be used to track the completion of CASHE findings, budget for their implementation, and to identify noncompliance trends that may need to be addressed through the issuance of new policy or training.

The Abandoned Mine Land Program completed development of a strategy plan that identifies priority work by watershed in each BLM State. This document was prepared to identify how BLM will use current funding and to address water quality and physical safety concerns throughout the public lands.

BLM tracks the expenditures of abandoned mine land, hazmat, and CASHE corrective action funding. Metrics on the completion of work related to each of these programs are measured and reported to the field annually. For example, in FY 2005 78% of BLM organizational units were

rated in good safety, health, and environmental condition. An organizational unit must have all its high priority facility compliance findings completed to be rated in good condition. An Instruction Memorandum will be issued in May 2006 requiring all organizational units to update the status of their CASHE findings.

BLM requires each organizational unit to update the status of CASHE findings and complete follow-up audits in an effort to increase performance and accountability. The second round of follow-up CASHE audits is approximately 60% complete. The percentage of BLM organizational units rated in good safety, health, and environmental condition increased from 49% in FY 2001 to 78% in FY 2005.

## **BUREAU OF RECLAMATION (BOR)**

### **Reporting Elements Cited Section 307 of E.O. 13148.**

The BOR states that this section is not applicable to them.

### **Environmental Management Systems.**

Requirements for provision of resources are in the Directives and Standards (D&S) and supported by the Policy. They are the responsibility of the appropriate facility's manager. Both the policy and D&S are currently in final draft. The D&S requires Regional Directors to ensure funding is available for appropriate facilities. .

BORs D&S is in final draft and being reviewed. BOR will provide EMS guidance through the abundance of material publicly available. Development and improvement of Reclamation's EMS will be through the existing environmental review process.

#### **1. Resources.**

Regional EMS implementation and program allocation is delegated to the regional directors by the final draft EMS Policy and D&S.

#### **2. EMS Guidance.**

BORs Office of Program and Policy Services is responsible for developing Bureau-wide Policy and D&S and for overall EMS program coordination. Final draft of the EMS Policy and D&S is being reviewed by the Regional Directors and is expected to be signed by EOM by the end of 2006. Copies will be available online.

BORs final draft EMS Policy and EMS D&S are in support of existing Departmental Manual (DM) guidance 515 DM 4. The guidance delegates to the regional and area offices responsible for regional and facility-specific EMS programs.

Three regions (Lower Colorado, Upper Colorado, and Mid-Pacific) will issue a guidance memorandum after BORs EMS policy and D&S or approved. The remaining regions (Pacific Northwest and Great Plains) will issue region specific guidance or will adopt the Bureau policy and D&S.

At this time, BOR regions use directives, policies, and other guidance documents developed and provided by the Department.

No facility within Reclamation has issued an EMS Self-Declaration Protocol, nor is there a Bureau requirement currently in place to do that. All HazMat D&S have been revised in draft to include the additional EMS requirements. The Reclamation Manual D&S ENV 02-08, Hazardous Materials and Hazardous Waste Auditing and Review Program Implementation, has been revised to include Self-Declaration Protocols and process and is waiting signature of EMS Policy and D&S before review and concurrence at the regional director level. The estimated completion date is May 2007 where it will be issued as part of Reclamation Manual ENV 02-08, Hazardous Materials and Hazardous Waste Auditing and Review Program Implementation.

### **3. Response to the President's Management Council (PMC) Compliance Management Improvement Initiative.**

BOR will have a formal EMS program when the EMS Policy and D&S are signed. However, BOR has two pilot facilities: Yuma Area Office and Desalting Plant, and Lake Baryessa. A definition of an "appropriate facility" has been developed as part of the Policy, and D&S. Appropriate facilities have been tentatively identified, and the list will be forwarded to the Office of Environmental Policy and Compliance shortly after the policy is signed.

### **FISH AND WILDLIFE SERVICE (FWS)**

#### **Reporting Elements Cited Section 307 of E.O. 13148.**

There are no FWS facilities that report releases of toxic chemicals under Emergency Planning and Community Right To Know Act (EPCRA) Section 313 provisions. Consequently no baseline has been established. FWS policies address all the requirements of Section 503 of E.O. 13148. The few FWS facilities to which the policies are applicable manage use of any Ozone Depleting Substances (ODS) effectively and have plans to phase out all acquisition of Class I ODS by December 31, 2010.

#### **Environmental Management Systems.**

Overall EMS policy is supported by Directors Order 144 (see <http://www.fws.gov/policy/do144.pdf>). Director's Order No. 144, "Greening the Service through Environmental Leadership" (see <http://www.fws.gov/policy/do144.pdf>) was established May 7, 2002. Section 7.a.3 of the Order directed the FWS to implement an Environmental Management System (EMS) per E.O. 13148. In addition, a Director's memorandum dated February 4, 2003, established the FWS's Environmental Management Commitment. This

commitment was affirmed with the issuance of the EMS Status Assessment and Self-Declaration Protocol on September 26, 2005. Director's Order No. 144 will be converted to a permanent FWS policy in 2006. In addition, the FWS developed metrics and self-certification procedures for EMS. These procedures provide assessment and review criteria, which can also serve as a guide to on-going maintenance.

## **1. Resources.**

A small amount of funding (\$150,000) was provided as a line item in the 2005 construction budget. Additional funding needed to implement EMS was drawn from existing operating budgets at the Regional and Headquarters level. FWS appropriate facilities received \$5,000 each for initial development and implementation of EMS. Other EMS related expenses needed to maintain the EMS program must come from existing operation accounts. In 2005 the FWS continued to implement EMS at facilities determined to be of appropriate size, complexity, and environmental impact. Teams of environmental personnel implemented EMS by assisting facilities with on-site visits. Visit included environmental awareness training for personnel, and with their assistance, writing an environmental management plan for the facility. The environmental management plan addresses required elements of EMS including policy, goals, targets, roles, responsibilities, and communications. Each facility was provided with \$5,000 seed money, to be spent on corrections and/or activities which furthered their EMS. At the close of 2005 66 facilities or 100% of appropriate facilities implemented EMS.

In 2005 the FWS developed metrics and self certification procedures for EMS, for application beginning in 2006. With future budget cuts, we will monitor the program with less travel and more telephonic communication. Also, in order to save resources, once stations are self-certified, we will audit the EMS program at the same time we conduct the compliance audit.

A total of 66 or 100% of appropriate facilities have documented management system procedures in an Environmental Management Plan.

## **2. EMS Guidance.**

The FWS has complied with Sections 401(b) and 404(a). Policies are in place and training was provided to Senior Managers, Regional Office personnel and field station personnel where EMS has been implemented. As of December 2005, EMS's are in place at 66 facilities, or 100% of the facilities determined to be appropriate for EMS implementation.

The Self-Declaration Protocol was issued September 26, 2005 via Assistant Director's memo to Regional Directors and Managers for distribution to facilities. The EMS Status Assessment and Self-Declaration Protocol assess the implementation status of the EMS at facilities which have had an EMS in place for a minimum of one year. Individual EMS elements are ranked based on the completeness criteria described in the protocol. EMS elements include environmental policy, an inventory of aspects and impacts, goals and targets, roles and responsibilities, document control, reporting, training, communication, budget, and measuring and monitoring. Overall,

implementation status is determined by calculating a total field station score using weighted values for each EMS element. In accordance with FWS policy, the Self-Declaration Protocol is beginning to be applied to EMS's one year and older during 2006. The status of formal on-going awareness training programs will be considered as part of that process.

The Washington Office Directorate and Regional senior managers received training on this program during the planning phases. In addition, Regional Environmental Compliance

Coordinators (RECC's) in each of the seven Regions have briefed senior staff at various Regional meetings. Appropriate facility personnel received an EMS and Greening in-brief during the initial EMS site visit.

The FWS developed a training manual for implementing EMS at FWS facilities, and also trained personnel who have taken part in EMS facility site visits and implementation and follow up. The manual was used to train field personnel during implementation visits.

All appropriate FWS facilities implemented an EMS prior to December 31, 2005. Facilities with an EMS in place one year or more will review EMS plans according to the procedure described in the Service's EMS Self Assessment and Self-Declaration Protocol. The reviews primarily are first party audits, but second party audits may be conducted in conjunction with an environmental compliance audit.

### **3. Response to the President's Management Council (PMC) Compliance Management Improvement Initiative.**

Ongoing activities are responsive to the PMC Bureau and facility level recommendations regarding policy, planning, support mechanisms, accountability, and checking. On-going activities involve the EMS, compliance auditing, awards programs, training, and quality assurance (Q/A) of audit procedures. In 2005 key accomplishments included the following.

#### **Bureau Level**

- Planning
  - Implemented EMS at 20 facilities, bringing total to 66, or 100% of appropriate FWS facilities
  - Conducted 208 formal and informal audits
  - Conducted four RCRA training courses
- Checking
  - Prepared annual audit report and submitted to Department of Interior (DOI)
  - Administered FWS Environmental Leadership Awards program
  - Received four DOI Environmental Achievement Awards
  - Tracked audit findings and closures
- Support Mechanisms
  - Conducted Q/A checks for four Regions
  - Issued EMS Status Assessment and Self-Declaration Protocol for use in 2006

#### Facility Level

- Policy
  - In 2005, 20 EMS appropriate facilities developed EMS policies. This addition makes a total of 66 facilities that have EMS policies. Framed policy statements are publicly displayed at each facility.
- Facility Level Planning
  - EMS and compliance auditing programs ensured that facility operations reflect environmental compliance management goals and requirements. A total of 208 formal and informal compliance audits were conducted in 2005.
- Facility Level Support Mechanisms
  - The FWS used its environmental compliance auditing program to identify and track noncompliance findings to completion.
- Facility Level Checking
  - Received EMS Status Assessment and Self-Declaration Protocol for use in 2006.

The accomplishments in establishing EMS's at appropriate facilities have been significant and can be attributed to the dedication of the Fish and Wildlife Service Regional Environmental Compliance Coordinators, Refuge/Hatchery Staff and the Headquarters Division of Engineering, Environmental implementation team.

FWS field managers have unique opportunities to partner with many other government agencies, environmental groups and private landowners to work cooperatively for the protection of the environment and in support of the Service mission.

During the EMS process, Standard Operating Procedures were written and utilized by our facilities, thus improving documentation and encouraging a sustainable environmental management system.

#### **MINERALS MANAGEMENT SERVICE (MMS)**

##### **Reporting Elements Cited Section 307 of E.O. 13148.**

Sections 502, 503, and 505 address reduction goals for toxic chemicals and management actions for ozone depleting substances. The MMS does not purchase toxic chemicals or ozone depleting substances; therefore, MMS has a negative response to this portion of the report.

##### **Other Activities.**

The MMS leases all buildings from the GSA. Although the MMS is not required to have an Environmental Management System, or required to perform environmental audits of its facilities, it is proactive in other environmental areas. The MMS supports environmental friendly procurement practices. For example, on February 27, 2006, we issued Acquisition Management Memorandum No. 2006-001, establishing MMS' Affirmative Procurement Program (APP). The APP formalizes MMS' goal to increase purchases of recycled-content products and environmentally preferable products and services to the extent feasible, consistent with price,

performance, availability, and safety considerations. In addition to requiring consideration of environmental factors in acquisition process, this policy requires acquisition personnel, including MMS business-line charge card holders, to attend green procurement training, preferably through the Office of Personnel Management's Gov Online Learning Center (GOLearn.gov). The MMS Support Services Office considers LEEDs planning when purchasing furniture and carpet.

## **NATIONAL PARK SERVICE (NPS)**

### **Reporting Elements Cited Section 307 of E.O. 13148.**

The NPS is currently developing Director's Order (DO) 30A: *Management of Hazardous Materials, Solid and Hazardous Waste and Environmental Contamination*, which underwent revisions in CY 2005 and will undergo further review in CY 2006. This DO requires parks to annually inventory specific hazardous chemicals and determine if there are environmentally preferable substitutes. It also encourages parks to reduce on-site inventories of hazardous chemicals and materials. Additionally, as part of its Environmental Audit Program (EAP), the NPS audits parks on their efforts to develop and implement an environmentally preferable purchasing program. These criteria include stipulations for reducing the purchase of toxic chemicals. Finally, the NPS has developed guidance documents to assist parks in reducing and managing toxic chemicals. These documents are available to parks on the Park Facility Management Division Intranet.

NPS concessioners utilize relatively small amounts of toxic chemicals in their operations. These materials are typically used for facility and equipment maintenance and cleaning. The NPS Concession Program has instituted specific procedures to encourage reductions in the use of toxic chemicals at NPS concession facilities. The Standard Concession Contract (<http://concessions.nps.gov/document/StandardContract%2Epdf> and <http://concessions.nps.gov/document/SimplifiedContract%2Epdf>) states that concessioners "shall submit to the Director, at least annually, an inventory of Occupational Safety and Health Administration (OSHA) designated hazardous chemicals used and stored in the area by the concessioner." In addition, it states that the use of extremely hazardous chemicals by concessioners must first be approved by the NPS Director. "The Director may prohibit the use of any OSHA hazardous chemical by the concessioner in operations under this contract." Concession contracts and their associated Operating and Maintenance Plans may encourage or require concessioners to use environmentally preferable products. Environmentally preferable products may also be recommended through the Concession Environmental Audit System (CEAS), which is administered by the Concession Environmental Management Program (CoEMP).

The NPS is close to finalizing a web-based tool that will allow the NPS to track information on the amounts and types of toxic chemicals used by parks and concessioners; it is anticipated that this web-based tool is scheduled to be fully implemented in CY 2006. This will allow the NPS to gather baseline data on toxic chemical releases under Section 313 of EPCRA and report successes in future EO 13148 reports. This may be of benefit to other DOI bureaus as well.

Currently, the NPS does not track use of cadmium, PCBs, mercury, and naphthalene. Releases of lead and use of non-leaded ("green") ammunition at NPS-owned outdoor firing ranges is tracked through an annual web-based survey. In 2004, baseline levels of lead released (9,800 lbs) and green ammunition used (3,000 lbs) were established. The data for CY 2005 have not been collected as of the time of this report. Data from CY 2005 and later years will be compared against the CY 2004 baselines to track Service-wide reductions in releases of lead to the environment.

There is no information currently available on the baseline volumes of cadmium, lead, PCBs, mercury, or naphthalene released in 2004 by concessioners.

DO 30A (currently under development by NPS) states that all park facilities must phase out the use of Class I ODS by December 31, 2010. The NPS EAP includes criteria relating to chlorofluorocarbon and halon management, encouraging parks to scale back the purchase and consumption of these substances. Because of this focus, several parks have been proactive in removing halon from park facilities, and others are taking steps to develop phase-out plans.

The NPS primarily uses ODS for facility and vehicle air conditioning. Therefore, the NPS would like to identify and acquire cost-effective ODS-free substitutes for its air conditioning needs. Unfortunately, this is proving to be quite a challenge for the Service, due to the lack of commercial availability of these substitutes. The Service is eagerly anticipating an increase in the supply of ODS-free air conditioning units, and plans to incorporate them into its purchasing programs once they are available at a reasonable price.

Concessioners can contribute to the use of ODS in national parks. These ODS are used in air conditioning and refrigeration equipment in lodges, restaurants, and other visitor service facilities. Concessioners are encouraged to use less ODS through the CEAS and, where applicable, in concession contract specifications and requirements.

### **Environmental Management Systems.**

The NPS EMS Task Group developed a unique EMS program that borrowed from ISO 14001 standards and the U. S. Environmental Protection Agency's Code of Environmental Management Principles (CEMP): the NPS Model EMS. From the Model EMS, NPS developed the EMS Toolkit, which provides step-by-step guidance for developing, maintaining, and improving a park-level EMS. The final Toolkit was completed and distributed Service wide in early CY 2004 and posted to the PFMD Intranet. The Toolkit specifies management review and monitoring procedures to determine whether or not the EMS is achieving its stated goals, objectives, and targets. Facilities are urged to consider the results of recent environmental audits as one set of monitoring and measurement data. Corrective actions should be taken when it is determined that the intent of the Environmental Commitment Statement is not being achieved and/or when the EMS fails to achieve established goals, objectives, and targets.

## **1. Resources.**

The Washington Area Support Office (WASO) allocated \$282,500 to the NPS regions in FY 2005 to maintain and improve existing EMSs. Additionally, NPS has integrated an EMS component into its EAP, allowing park EMS activity to be reviewed during audits. Because these reviews are part of the audit, they are financially supported by the EAP budget. WASO will continue to provide funding for EMS activities at all appropriate facilities to ensure EMSs are improved and maintained.

For the NPS Concession Program, this objective relates to resources needed to implement the CoEMP, and therefore, facilitate EMS development and implementation by concessioners, as well as resources to develop and implement concessioner EMSs. CoEMP resources are allocated through the NPS WASO Concession Program budgeting process. The NPS WASO Concession Program dedicated approximately \$600,000 in CY 2005 to administer the CoEMP in support of its mission to "provide assistance and guidance that advances the environmental performance of businesses offering visitor services in national parks." There was no dedicated portion of this budget exclusively targeting EMS as most CoEMP activities provide technical support and guidance to assist concessioners in developing and implementing such systems.

In 2005, the CoEMP staff included three full-time staff and environmental consultant, support. Partnership efforts to share information, expertise, experiences, and resources between the CoEMP and the US EPA National Center for Environmental Innovation continued in 2005 under a Memorandum of Understanding. One effort was to promote EMS as an approach that is good for the environment and good for business. In addition, the CoEMP received a Department of Energy grant in 2004 to help develop an Internet-based training course on EMS topics for NPS concession staff; development of this training course continued in 2005. Moving forward, the fiscal reality is that the Concession Program has a number of high priority programs and activities that affect the CoEMP budget. As a result, the ideal schedule for implementing elements of the CoEMP has been affected. Most noticeably, the completion of concessioner environmental audits through the CEAS has been slower than desired, assistance in providing parks with information on EMS development and implementation has been constrained, and environmental training for NPS and concessioner staff has not been fully developed.

At park and regional levels, budgets limit the ability to fund CoEMP involvement in park and regional concession environmental activities, such as contract development, evaluation panel, and EMS review participation – in addition to limiting their ability to support full-time environmental and/or concession staff. Legal review for CoEMP documents was also slow due to the NPS Solicitor's Office workload in 2005. Given the current overall NPS WASO Program Concession budget, contracting priorities and staff needs, it is unlikely that the CoEMP will receive significant funding increases over the next few years.

In terms of developing and implementing concessioner EMSs, since concessioners are contractors working within the national parks, the NPS does not provide concessioners with resources (i.e., funding, staffing) for operating their businesses. Under the concession contracts currently being issued, developing and implementing EMSs is a standard business practice and

requirement to which concessioners must adhere. The Concession Program has the responsibility to ensure that concessioners working within the national parks have the financial capability to provide the required visitor services stated in their concession contracts. Therefore, in preparing a request for proposal (RFP) for a concession contract, the Concession Program has accounted for costs in developing and implementing an EMS; in evaluating proposals responding to the RFP, the Concession Program has analyzed whether offerors have accounted for costs in developing and implementing an EMS.

## **2. EMS Guidance.**

Last year's (2004) Annual Report on EO 13148 stated that the broad distribution of CoEMP EMS guidance on developing, implementing, maintaining, and improving EMSs had not taken place since they were awaiting legal review. Currently, these documents are still awaiting legal review. In 2005 the CoEMP continued to circulate Version 2.0 of the *GreenLine* CD, which included CoEMP-developed EMS resources for 10 concession service types, to assist primarily small and medium-sized businesses (which comprise the majority of concessioners working in the NPS) in developing, implementing, maintaining, and improving EMSs. Eleven additional CoEMP-developed EMS resources for a variety of concession service types were drafted during CY 2005 and will be added to Version 3.0 of the *GreenLine* CD. The CD includes links to EMS Internet resources to which users can connect.

The NPS developed an EMS Self-Declaration Protocol in CY 2004. This protocol is included in Appendix 18 of the revised NPS Auditor's Handbook finalized in CY 2005. The protocol includes procedures for auditing a park-level EMS and a process by which a park Superintendent can declare that an EMS is fully implemented.

The NPS Concession Program does not intend to develop a Self-Declaration Protocol for concessioner EMSs; however, it will utilize various policies, guidance, and procedures that are either already in place or being developed to provide a self-declaration process. Concessioners operating under contracts requiring documented EMSs are required to have their initial EMS reviewed and approved by the NPS Director within 60 days of the effective date of the contract and annually thereafter [Standard Concession Contract, Section 6(b)(1)]. As a practical matter, this responsibility is delegated to the park Superintendent. In addition, concessioners are subject to annual contract and operational compliance evaluations that include a review of a concessioner's EMS compliance [Standard Concession Contract, Section 6(c)] and overall environmental management practices. Environmental evaluation criteria are currently under development. Training for NPS personnel who conduct concessioner environmental performance evaluations is typically conducted every two years.

In addition to these external EMS assessment processes, an internal EMS review element is required for concessioner EMSs under their concession contracts (Standard Concession Contract, Section 6(b)(3)(ix)). This EMS element includes an annual self-assessment of concessioner performance relative to its EMS. Some concessioners have demonstrated that their EMSs also meet third party EMS standards, such as the International Organization of Standards (ISO) 14001.

The EMS tracking system shows that, as of April 2006, 244 (82 percent) NPS appropriate facilities have developed an awareness training program. The other 18 percent of facilities are working toward training program development.

One of the nine required EMS elements identified in Section 6 of the Category I and II Standard Concession Contract is training, which requires that a concessioner describe environmental training, including identifying staff that should be trained, training subjects, training frequency, and how training will be documented. EMS guidance issued by the CoEMP thus far encourages concessioners to train all staff on the EMS, since each employee's work impacts the environment. As new concession contracts are issued, it is expected the EMS developed will include this training element, including the need to make all staff aware of the EMS. As indicated above, when the park reviews and approves the concessioner's EMS, it is expected that the training element will be reviewed to ensure compliance with the concession contract.

As of December 31, 2005, it is estimated that out of the 181 concessioners that are considered appropriate facilities that require an EMS, 61 (34 percent) have been issued new concession contracts that require an EMS that incorporates the training element. When requested by parks, the CoEMP has reviewed the draft documented EMSs of concessioners to provide guidance on concessioner conformance with contract requirements; as of December 31, 2005, the CoEMP has reviewed 28 EMSs from the 181 appropriate facilities. It should be noted that these data do not reflect those concessioners that have proactively and voluntarily established environmental training even if an EMS is not required by their contract (e.g., they are operating under an older concession contract or under a Category III contract).

The EMS tracking system shows that 212 (71 percent) NPS facilities have a documented EMS in place with another 16 percent having an EMS under development, as of April 2006.

As described above, under the current concession contract regulations, Category I and II concession contracts require the development and implementation of an EMS. As new Category I and II concession contracts are issued, the requirements for a documented EMS and associated management system procedures are being incorporated. The data for the percentage of appropriate facilities that have established environmental management programs and associated management system procedures are the same as for the percentage of appropriate facilities that have EMS awareness training (34 percent).

The EMS tracking system shows that, as of April 2006, 249 (84 percent) NPS appropriate facilities have developed a self-declaration procedure. The number of parks that have completed self-declaration is not known at this time.

As described above, the NPS Concession Program does not intend to develop a Self-Declaration Protocol for concessioner EMSs; however, it will utilize various policies, guidance, and procedures that are either already in place or being developed to outline a self-declaration process that concessioners can elect to follow. Refer to the section on the "Self-Declaration Protocol" above for additional detail.

### **3. Response to President's Management Council (PMC) Compliance Management Improvement Initiative.**

The NPS responded to the "Request for Bureau Responses to the President's Management Council Compliance Management Improvement Recommendations" in May of 2005. In this response, the NPS detailed how it identified relevant compliance requirements; transmitted compliance requirements, support tools and departmental environmental compliance management expectations to facilities in the context of operational expectations; and aggregated measurement information from facilities to be reported to DOI.

The Concession Program also responded to the "Request for Bureau Responses to the President's Management Council Compliance Management Improvement Recommendations" alongside the NPS.

The progress made towards the recommended elements included:

- Policy. Most DOI environmental compliance management and enhancement goals articulated through Departmental policy (Departmental Manual) do not explicitly address concessioner activities, but set policies for environmental compliance and enhancement that apply to all Department lands, facilities and operations (which are construed to include NPS concessioner operations). Those that are applicable to concessioners were communicated by the Concession Program – to NPS staff at the facility level who have oversight responsibility of concessioners. Park concession staff then communicated this information to concessioners (who were responsible for their own environmental compliance and performance). (Note that the Concession Program at the Headquarters level does not have line authority for direct oversight of concessioners' routine performance.)
- Planning. The CoEMP participated on the DOI EMS Council so that the Concession Program could integrate DOI environmental compliance management and performance enhancement goals and work toward incorporating these into appropriate concessioner operating plans and environmental programs. Although DOI goals were not immediately attained, efforts continued to be made in 2005 to provide environmental compliance assistance to concessioners via the audit program, newsletter, CD, website, and other means; and have new concession contracts incorporate environmental compliance requirements and appropriate best management practice opportunities. These new concession contracts also included a requirement for concessioners who are assigned facilities and land within the NPS to develop and implement an EMS. Other concessioners were encouraged to develop and implement an EMS.
- Support. Decreased park budgets and decreased personnel at all levels of the NPS continue to be a factor in implementation of a comprehensive EMS. Despite these challenges, concessioners were still required in 2005 to comply with all applicable laws, as defined in their concession contracts and the audit operating guide, and as described in available concession-specific resources. Both informal training via environmental audits

and development and updates of formal trainings took place for concessioners and park concession staff. Data (i.e., audit data), were analyzed to help determine where CoEMP resources could be best directed to help concessioners improve their environmental compliance. The CoEMP also developed a draft mechanism to track the status of corrective actions for compliance audit findings; this mechanism will be modified and finalized once a centralized Concession Program data management system (currently under development) is fully implemented.

- Accountability. The Concession Program defined environmental roles and responsibilities for staff in the CoEMP. However, environmental compliance was still the responsibility of concessioners, who are required via the new Standard Concession Contract to designate an Environmental Manager. Information from concessioners was reported from parks to the Concession Program when requested and where possible (there is no direct line authority from the Concession Program to the concessioners or park concession staff). To evaluate the implications of resource shortfalls on meeting environmental management goals and objectives, the CoEMP continued to update a monthly work plan with goals, objectives, and tasks.
- Monitoring and Follow-up. The CoEMP assessed concessioner compliance through a dedicated concessioner environmental audit program. In addition, evaluation standards meant to evaluate compliance by park concession specialists on at least an annual basis were under development in 2005. Resource restrictions did not allow the CoEMP to complete baseline audits of all concession operations in 2005, although routine audits did start in 2005.

## **OFFICE OF SURFACE MINING (OSM)**

### **Reporting Elements Cited in Section 307 of E.O. 13148.**

The OSM does not operate any facilities; therefore, sections 502 (toxic chemical release reduction goals), 503 (reduction goals for specified chemicals), and 505 (use of ozone-depleting substances) under E.O. 13148 are not applicable.

### **Environmental Management Systems.**

For FY 2005, OSM completed 20 environmental audits and completed baseline audits at each OSM office. Currently, another round of environmental audits are being completed for comparison purposes to enhance compliance and development of their EMS. OSM has conducted an EMS training class for its 20 collateral duty safety officers and has prepared a second audit checklist to be used in conducting its facility audits. The new checklist provides more EMS information to further enhance the program. Also, OSM has prepared a draft EMS policy which includes requirements of E.O. 1348. This policy is now in a very short comment period and should be finalized soon.

## **Other Activities.**

Although OSM does not own, operate, or maintain facilities subject to the requirements of EO 13148, OSM supports DOI efforts to develop a sound EMS. OSM actively promotes environmentally-friendly practices under other Greening executive orders, including those governing procurement, recycling and waste prevention. OSM is making steady progress in implementing the EO.13148 requirements. As a member of the DOI planning group carrying out the mandates of EO 13101, OSM played a key role in developing the Strategic Plan for Greening the Department of the Interior through Waste Prevention, Recycling and Federal Acquisition. Following the release of the strategic plan in May 2000, OSM actively worked with other Interior Bureaus and Offices to prepare a detailed action plan describing the specific steps the Department will take to implement the Greening strategy.

OSM serves on the DOI committee developing the second annual Memorandum of Understanding (MOU) with UNICOR—the trade name for the Federal Prison Industries. The MOU on Recycling and Reuse of Electronic and automation equipment supports both EO 13101 and EO 13148. For the past five years OSM has participated in the transit subsidies program authorized under EO 13150 – *Federal Workforce Transportation*. Also, where feasible OSM follows the guidelines for procurement of Alternative Fueled Vehicles and reduction of fossil fuel usage, in support of EO 13149 – *Greening the Government through Federal Fleet and Transportation Efficiency*.

## **U. S. GEOLOGICAL SURVEY (USGS)**

### **Reporting Elements Cited Section 307 of E.O. 13148.**

The USGS Environmental Management (EM) Council addresses Bureau wide implementation of the reduction requirements of Section 502 regarding the release of toxic chemicals reported under Section 313 of the Emergency Planning and Community Right-to-Know Act on a regular basis. The EM Council reviews Section 502 requirements and activities as applicable in quarterly meetings to improve consistency in implementation across the Bureau. To date, the Bureau continues to emphasize a decentralized approach, leaving local level supervisors and managers with implementation responsibilities on a facility-specific basis. Local efforts at individual facilities have resulted in unused chemicals, otherwise destined for disposal or treatment, being offered to other organizations for use, resulting in waste reduction and disposal costs.

The newly formed USGS Environmental Management Council will develop a Bureau wide plan to phase-out the procurement of Class I ozone-depleting substances (ODS) by the required date of December 31, 2010. The plan will rely primarily upon existing tools (such as a computerized facilities maintenance management system, and condition assessments) to identify the present use of ODS, and to monitor efforts to phase-out procurement of these substances. It is likely that initial efforts will focus on the USGS EMS facilities.

Individual facilities are implementing measures to address the goals of Section 505. For example, the USGS National Center has a refrigerant management procedure, which requires the Operations and Maintenance Contractor to track the use of all refrigerants onsite. The procedure includes maintenance of a standardized log that identifies equipment currently in use, the type of refrigerant used, quantities used, quantities purchased, and quantities removed from the site.

The National Center, Reston VA, recently upgraded a chiller plant, which included the removal and replacement of refrigeration units (i.e., chillers) that used a combined total of 12,800 pounds of R-11 refrigerant (trichlorofluoromethane), an ozone depleting substance. These new units use R-134A refrigerant, a replacement compound for ozone-depleting substances. This project also added a monitoring system to detect if the units are leaking refrigerant and removal of one 500-ton chiller containing 1,250 LBS. of R-123.

#### Regional Responses:

Mercury: The Water Resources Discipline (WRD) has mandated removal of all mercury-containing equipment from their facilities, with the exception of National Institute of Standards and Technology (NIST) calibration thermometers for scientific research. This information is documented in WRD directives. All disciplines still have mercury-containing thermometers; although their use is discouraged with many being collected and disposed of as they are discovered through regional Occupational Safety, Health and Environmental (OSHE) audit activity.

Lead and Cadmium: The three USGS regions are making a concerted effort to reduce and replace lead-containing items. This includes the lead weights used on capture nets for birds, anchors on boats, and sounding weights for current meters and water quality sample equipment. As capture nets are replaced, the lead weights are being replaced with a non-lead weight. Sounding weights are being coated with either a 2-part epoxy or rubber. Excess inventory is encased in "visqueen" to further reduce exposure. As excess inventory is activated, it is coated prior to being placed into service. Each region is also actively involved in educating its personnel on the dangers of lead both on exposure issues and on potential water/soil contamination issues (in all disciplines). Welding operations have become a regional high interest area, with surface contamination testing for lead and cadmium and associated with adjacent welding operations began in CY 05 and continues in CY 06. Operations are characterized through representative sampling and exposure controls; clean up protocols and pollution prevention consultation are the expected results. The Western Regional Environmental Specialist has discussed the use of lead free solder for electronics work with appropriate facilities and electronics waste is disposed of through appropriate recycling operations throughout the region.

#### PCBs (polychlorinated biphenyls)

- Transformers: There are few facilities that own transformers across the USGS, as 99 percent are owned by the respective utility companies and/or GSA for leased property. For USGS owned transformers, they have been tested, with results indicating non-PCB containing.

- Ballasts: Many USGS facilities have fluorescent light ballasts/capacitors containing polychlorinated biphenyls (PCBs). As these fluorescent bulbs are replaced, facility personnel have been educated to replace them with non-PCB containing (environmentally friendly or green) ballasts and dispose of the PCB-containing ballasts properly, as a
- Universal Waste. Regional staff provide support to the field via assistance and guidance in these processes.

Naphthalene: There is no known use within the USGS.

CFC's: The region's assist local science centers with the proper removal and disposal of any CFC's or CFC-containing equipment. At the present time all facilities within the Western Region are in compliance regarding CFC's. There are a few instances of CFC use that will become regulated in the near future as the phase-out time table for these substances advances.

- Halon: Although some facilities still have Halon-containing fire extinguishers, as they are used and/or discharged, they are being replaced with non-Halon A/B/C fire extinguishers.

Electronics: The USGS has a workgroup tasked to formulate PC disposal policy for the USGS. The workgroup will review DOI Greening Webpage(s) inclusive of the Electronics Stewardship MOU at this meeting, with subsequent meetings conducted to integrate elements of the MOU into existing or new policy. Estimated Completion Date is September 30, 2006. Since there are many aspects to the Electronics Stewardship MOU, the workgroup will also focus on the reuse and recycling of computer electronics, with subsequent review to be solicited from the Offices of Procurement and CIO for specific green purchasing and life cycle management related items. In addition, the Office of Acquisitions has also added Information Technology Acquisitions information on their website to facilitate employee awareness of IT disposal issues.

For control of Cadmium in electronic equipment (computers, TVs, video) regional environmental staff continue to promote recycling or donation of these items and assisting the Collateral Duty Environmental Protection Coordinators (CDEPCs) and Property Control Officers (PCOs) in locating local recycling centers, determining reusable equipment and making suggestions for places to donate. An example of this is within Central Region, where all electronic equipment, i.e., computers, drafting light tables, etc. are recycled through the Rocky Mountain Regional Cooperative Administrative Support Unit (CASU) under the Department of Health and Human Services. Useful electronic equipment is donated to schools who comply with the requirements of Executive Order (EO) 12999, *Educational Technology: Ensuring Opportunity for All Children in the Next Century*. This EO allows the donation of educationally useful Federal equipment to kindergarten through Grade 12 schools.

### **Environmental Management Systems.**

The USGS used a risk-based approach to identify which facilities were appropriate for EMS implementation. A facility questionnaire was fielded in Calendar Year 1999 to gather facility

operational information to assist with this identification process. The USGS used the information gathered from these questionnaires to identify the facilities to include in the environmental compliance audit program, and these facilities received a comprehensive external baseline environmental audit. These same facilities are considered appropriate for EMS implementation and are shown below. The USGS had 29 facilities in CY 2004 but removed Georgia Water District office after reassessing scope of their environmental activities. At least one facility will be added to the appropriate facilities list during Calendar Year 2007: National Wetlands Research Center in Lafayette, Louisiana

Headquarters: The Bureau Environmental Program Manager is responsible for coordination of EMS implementation at the National Center (NC), Reston VA and chairs the NC EMS Committee with members made up of Collateral Duty Environmental Program Coordinators.

USGS appropriate facilities are:

1) National Center, Reston VA

Eastern Region: The Eastern Region has 12 designated "appropriate facilities." (EMS Centers) Of these, all have begun implementation of EMS. Two of the facilities did not make the December 2005 deadline; however, since that time these facilities have begun implementation. Due to turnover in personnel (due to retirement, etc.), two facilities have begun implementation of EMS; however have not completed the EMPs. These facilities will have these completed by July 2006.

- 1) Patuxent Wildlife Research Center, Laurel, MD
- 2) Leetown Science Center, Research & Development Laboratory, Wellsboro, PA
- 3) Leetown Science Center, SO Conte Anadromous Fish Laboratory, Turner Falls, MA
- 4) Great Lakes Science Center, Ann Arbor, MI
- 5) Great Lakes Science Center, Hammond Bay Biological Station, Millersburg, MI
- 6) Great Lakes Science Center, Tunison Laboratory of Aquatic Science, Cortland, NY
- 7) Upper Midwest Environmental Sciences Center, LaCrosse, WI
- 8) National Wildlife Health Center, Madison, WI
- 9) Leetown Science Center (LSC), Kearneysville, WV
- 10) Florida Caribbean Science Center (FCSC), Gainesville, FL
- 11) Coastal and Marine Geology Team, St. Petersburg, FL
- 12) Coastal and Marine Geology Team, Woods Hole, MA

Central Region: Central Region has eight (8) designated "appropriate facilities". One facility, the Ecological Toxicology Research Station, located in Yankton, South Dakota, has been proposed for removal as a designated appropriate facility. No implementation has been initiated at this facility as there are only two personnel, the station manager and a volunteer. The Bureau has nominated the National Wetlands Research Center, located in Lafayette, Louisiana, as an appropriate facility. Six of the remaining seven facilities achieved the December 2005 deadline. Of the seven appropriate facilities, six have begun implementation of the Environmental

Management System (EMS). One facility has not completed development of the environmental management plans (EMPs) due to restricted personnel resources. This facility will have the EMPs completed by August 2006.

- 1) EROS Data Center, Sioux Falls, SD
- 2) Northern Prairie Wildlife Center, Jamestown, ND
- 3) Columbia Environmental Research Center, Columbia, MO
- 4) Ecological Toxicology Research Station, Yankton, SD
- 5) National Water Quality Lab, Denver, CO
- 6) Denver Federal Center, Denver, CO
- 7) Mid-Continent Mapping Center, Rolla, MO
- 8) Albuquerque Seismological Laboratory, NM

Western Region: The Western Region has 7 designated "appropriate facilities." (EMS Centers) Of these, all have begun implementation of EMS and made the December 2005 deadline. Three facilities have completed or begun their EMPs. Three facilities are ready to enter the EMP phase and one facility is well behind the others due to other requirements. All facilities, except the last will have completed the EMP phase by July 2006. No facilities in the Western Region will be able to self-declare this fiscal year. The Regional Environmental Specialist conducts telephone status reviews every 30 days at a minimum and maintains contact with the facilities on an average of a bi-weekly basis to provide assistance to the facilities and answer any questions they may have.

- 1) Columbia River Research Lab, Cook, WA
- 2) Pacific Island Ecosystems Research Center, (Kilauea Field Station, Volcano, HI)
- 3) Alaska Science Center, Anchorage, AK
- 4) Western Fisheries Research Center, Seattle, WA
- 5) Menlo Park, CA
- 6) Hawaii Volcano Observatory
- 7) Water Resources (Placer Hall), Sacramento, CA

## **1. Resources.**

Resources for EMS are included as a part of the overall safety, health, and environmental budget request. In calendar year 2004-05, \$56,000 was allocated to develop on-line training through DOI University for 1) Collateral Duty Environmental Program Coordinators and 2) Environmental Orientation for All Employees. The training site is expected to be complete and accessible to all DOI employees in Calendar Year 2007. This training includes the following three modules addressing Environmental Management Systems: EMS – Overview; EMS – Design; and EMS – Implementation. In addition, approximately \$280,000 was allocated in FY 2005 and another \$38,000 annually in each out year beginning in FY 2006, for continued operation of the EMS facilitation system, a web based tool designed to assist the 28 USGS appropriate facilities with administrative and recordkeeping requirements associated with implementing an effective EMS. This system allows self assessment of EMS conformance, and in conjunction with the DOIU training will facilitate EMS implementation at the facility level.

Additional resources are allocated to Bureau projects based on elements identified either by the USGS Environmental Management Council and/or Environmental Program Manager by the Bureau Occupational Safety, Health and Environmental Program Manager. An example of this was an additional \$40,000 for development of an internal web system for documenting field level environmental compliance with regulatory guidance.

Initial program development and implementation was facilitated and funded by the Headquarters Safety and Environmental Management Branch. Guidance documents and a Web based EMS Facilitation system were developed in CY 2005 and promulgated in January 2006. Funding at the Center level for EMS development and implementation was unnecessary due the level of bureau/regional support. Funding for EMS aspect/impact projects will come from Centers appropriated operations and maintenance funds. In cases Deferred Maintenance and Capital Improvement (DMCI) projects may be derived from EMS program actions. Resources at the regional and field office levels are allocated out of their respective budgets, with technical support to EMS appropriate facilities provided by the Regional Environmental Program Coordinators. All regions have supported and committed to undertake and complete EMS implementation training for all EMS Centers.

Additional regional specific resources for EMS implementation are allocated out of the respective regional and field office budgets as described below:

#### Headquarters and Regional Responses:

HQ dedicates 50% FTE to EMS implementation at the National Center facility. Collateral Duty Environmental Program Coordinators (CDEPCs) spend about 1% of their time on EMS inclusive of the initial input of data into the system and when Regional staff performs 'update' calls.

Eastern Region dedicates 85% FTE to EMS implementation. CDEPCs at the field level spend about 1% of their time on EMS inclusive of the initial input of data into the system and when Regional staff performs 'update' calls. One Science Center has a CDSPEC/EPC who spends higher percentage of time on EMS.

Central Region dedicates 15% of one FTE to EMS implementation. CDEPCs spend about 1% of their time on EMS inclusive of the initial input of data into the system and when Regional staff performs 'update' calls. Four Science Centers have a CDSPEC/EPC who spends higher percentage of time on EMS.

Western Region dedicates 50% of an FTE to EMS implementation. CDEPCs spend about 2% of their time on EMS inclusive of the initial input of data into the system and when Regional staff performs 'update' calls.

## **2. EMS Guidance.**

The USGS has incorporated EMS goals and requirements of E.O. 13148 into existing agency environmental directives, policies, and documents. To follow up on his EMS policy memo in

FY 2003, the Director reaffirmed his commitment to EMS implementation via a subsequent memo released in 2005 that restated the bureau's environmental management policy and commitment statement, and announced the formation of the USGS Environmental Management Council to direct and oversee implementation efforts throughout the bureau. In this memo he requested that the bureau's Environmental Management Policy and Commitment Statement be prominently displayed in each facility throughout the bureau. Note that the Director and his senior level staff had EMS training in CY 2004.

To further increase EMS awareness, the Chief, Office of Administrative Policy and Services (APS), also issued a memorandum the availability of EMS guidance, templates, and worksheets on the USGS intranet. These tools define the scope and elements of EMS, and provide a template for USGS facilities to document environmental procedures and systems.

The USGS maintains an internal website, "Environmental Purchasing," which provides guidance on Government procurement of products and services. The website reflects EMS concepts, and addresses the environmental consequences of choices in products and services. Specifically, the website addresses:

- considering the relative energy consumption of competing alternatives;
- avoiding hazardous materials when there is a safer alternative;
- avoiding ozone-depleting substances;
- selecting items with recycled content and/or bio-based product alternatives; and
- considering the eventual disposal costs of alternative products

In addition, the "Environmental Purchasing" website provides access to an environmentally preferable purchasing database, and identifies relevant requirements and references. The Safety and Environmental Branch in the Office of Management Services, also maintains an internal website with comprehensive information related to Environmental Management Systems. Information provided includes the USGS EMS manual, policy memoranda, guidance, templates, and links to related websites.

All three USGS regions (Eastern, Central and Western) have adopted the Bureau directives, policies and documents, with this information being forwarded to the field science centers. Additionally, Regional Environmental Coordinator have completed on-site training for EMS at all the EMS "appropriate facilities" and provide frequent consultation and assistance to facilitate EMS program management and implementation. All OSHE compliance audits are undertaken in a multimedia approach, with EMS goals and requirements a part of the activity. The region's have maintained or in the process of developing standardized status reports that can be updated on a regular basis.

The USGS initially developed EMS Self-Declaration Protocol for use at the 28 appropriate facilities, which was in conformance with the Department's Environmental Compliance Memorandum No. ECM04-2. The protocol was to be used in conjunction with automated annual EMS self-audits, beginning in Calendar Year 2005. The EMS conformance audit will be completed by every appropriate USGS facility in conjunction with their annual environmental

compliance self-audit. Upon completion, each facility could self-declare the status of their EMS based on one of three categories: 1) EMS in development; 2) EMS in place with implementation underway; or 3) EMS fully implemented. In addition, an independent external review of each EMS facility will be conducted by Regional Environmental Program Coordinators on a four-year cycle to verify the EMS status of each of the facilities. USGS protocols now conform to new DOI scorecard criteria, provided to DOI Bureaus in January 2006 and used for reporting within this report. The Self Declaration Protocol will be provided as a final step in the annual EMS self-audits. Beginning in CY 2006, these EMS status assessments will be entered into the EMS automated system so that implementation across the bureau can be readily evaluated. This evaluation will form the basis of the bureau's annual EMS certification regarding EMS implementation, as required by ECM04-2.

The general awareness training is located within the web-based EMS software that USGS has deployed and is proprietary in nature, hosted by a private contractor. In addition, the USGS has developed EMS awareness training for all agency employees, with expectations for full access to all DOI employees in CY 2007.

Headquarters: Awareness training for senior managers and other personnel was completed in 2005.

Eastern Region: Awareness training for senior managers and other personnel was completed in 2004. Training on the EMS web-based system was conducted for CDEPCs and some senior managers (through on-site visits and teleconferences) in between August and December 2005 (with the exception of two facilities in Eastern Region, which was accomplished in February and March 2006).

Central Region: Awareness training for senior managers and other personnel was completed by December 2005. Training on the EMS web-based system was conducted for CDEPCs and some senior managers (through on-site visits and teleconferences) between September and December 2005.

Western Region: Awareness training for senior managers and other personnel was completed in 2005. Training on the EMS web-based system was conducted for CDEPCs and some senior managers (through on-site visits and teleconferences) between August and December 2005.

The deployment of the automated tool to assist appropriate facilities with identifying and tracking measurable objectives and targets, resulted in twenty-two of twenty eight facilities (82%) documenting their goals and objectives based on identification of significant environmental aspects. Remaining appropriate facilities are expected to have documented measurable objectives and targets by December 31, 2006.

- Percent of appropriate facilities that have documented measurable environmental objectives and targets: (25/28 or 89%)
  - Headquarters: (1 of 1)/100%
  - Eastern Region: (12 of 12)/100%

Central Region: (7 of 7) 100 %  
Western Region: (5 of 7) 71%

- o Percent of appropriate facilities that have established environmental management programs to achieve each of their environmental objectives and targets: (22 of 28 or 78%)  
Headquarters: (1 of 1)/100%  
Eastern Region: (12 of 12)/100%  
Central Region: (6 of 7) 85.7 %  
Western Region: (3 of 7) 43%

As of the close of Calendar Year 2005, there were no USGS appropriate facilities in a position to self declare, primarily due to the delay in program implementation awaiting web EMS system acquisition and deployment, which didn't occur until August-September 2005. Although in the Eastern Region, one facility can self-declare by July 2006. As annual internal conformance audits are conducted beginning in 2006, the remaining 27 appropriate facilities will be able to self-declare between December 2006 and December 2007. Regional Environmental Protection Specialists are tracking EMS progress via requiring EMS appropriate facility status reporting as well as review via access to the EMS web system. Some regions maintain contact with appropriate facilities as frequent as bi-weekly to provide assistance and to answer questions regarding implementation, with others establishing a less frequent reporting process.

### **3. Response to President's Management Council (PMC) Compliance Management Improvement Initiative.**

The USGS developed a web based Inspection and Abatement System (IAS) during CY 2005 which is scheduled for release in CY 2006. This system allows all local field organizations to conduct a self audit of general environmental compliance, and track findings through final abatement action. In the interim, all USGS facilities conducted a self assessment of their environmental programs using MS Excel spreadsheet with questions provided by Headquarters staff. Audit findings not closed were transferred to the new IAS for CY 2006 tracking through abatement.

Beginning in CY 2006, full time environmental staff will supplement local facility inspection efforts by conducting environmental program and EMS compliance audits at appropriate facilities. EMS audits are extensive in scope and conducted by external auditors.

Department of the Interior and/or Bureau Scorecard Metrics:

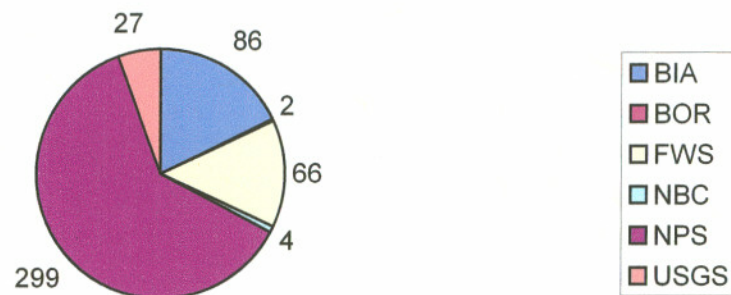
Within the USGS, all appropriate facilities are at different levels of EMS implementation with some more advanced than others. EMS implementation involves both developmental and on-going implementation phases to get to self-declaration and requisite management review cycles. The USGS monitors each location internally using performance measures to determine what phase of EMS implementation they are in. The performance measures monitor the primary goal of EMS Self-Declaration and recurring internal EMS management review performance. The performance measure metrics are provided below:

1. FY 2006 Goal (baseline). Percent of appropriate facilities that do at least one management review and comply with Departmental documented procedures. (# of bureau designated appropriate facilities meeting the criterion above divided by a total # of designated bureau appropriate facilities). (0/28 = 0%)
2. Bureaus in a Developmental Phase of EMS Implementation. Percent of appropriate facilities with an environmental policy statement that identifies required EMS elements to establish a successful program. (# bureau designated appropriate facilities meeting the criterion divided by a total #of designated bureau appropriate facilities): (28/28 = 100%)
3. For Bureau Facilities in an On-going Phase of EMS Implementation: Percent of appropriate facilities that have documented EMS procedures. (# of bureau designated appropriate facilities meeting the criterion divided by a total of 50 designated bureau appropriate facilities) (27/28 = 96%)
4. Facility EMS Policy: Appropriate facilities that have issued an EMS policy (28 of 28/100%). 100 percent of the 28 appropriate facilities have signed and issued a facility EMS policy statement. Each facility was instructed by the USGS Director in his December 29, 2003 environmental commitment memorandum to endorse and prominently post the bureau policy. Further, facility policy statement templates and guidance are posted on the USGS EMS intranet website to aid all facilities with preparation of the policy statement
5. Facility Implementation Training Appropriate facilities that have conducted EMS training. (28 of 28/100%). 100 percent of the 28 appropriate facilities have received or conducted EMS training for the facility staff responsible for developing and implementing the EMS.
6. Facility Significant Environmental Aspects. Appropriate facilities that have identified and documented environmental aspects. (26 of 28/93%) All but two USGS facility has identified and documented their significant environmental impacts.

CY 2005 DOI Designated Appropriate Facilities and Facility-Level EMS's Implemented or Implementing

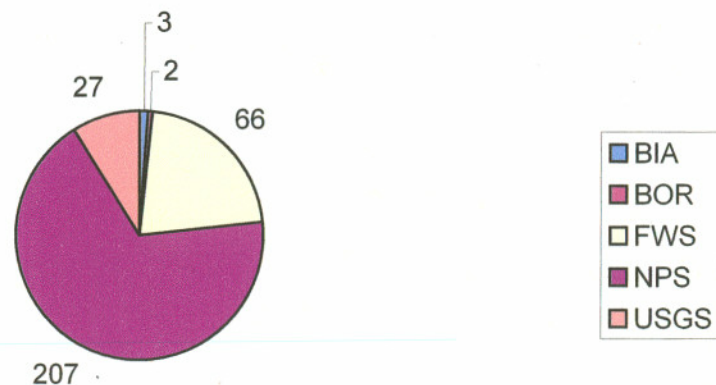
Bureau	Facilities
BIA	86
BOR	2
FWS	66
NBC	4
NPS	299
USGS	27
<b>DOI Total</b>	<b>484</b>

**CY05 DOI Appropriate Facilities = 484 Total**



Bureau	EMS's
BIA	3
BOR	2
FWS	66
NPS	207
USGS	27
<b>DOI Total</b>	<b>305</b>

**CY05 Facility-Level EMS's Implemented or Implementing = 305 Total**



# **APPENDIX**

Fiscal Year 2005 Departmental Summary Report on Bureau  
Environmental Auditing Programs



# United States Department of the Interior


OFFICE OF THE SECRETARY  
Washington, DC 20240



MAR 30 2006

## Memorandum

To: Heads of Bureaus and Offices

From: Willie R. Taylor, Director   
Office of Environmental Policy and Compliance

Subject: Fiscal Year 2005 Departmental Summary Report on Bureau Environmental Auditing Programs (ER 05/792)

The Department of the Interior's (DOI) mission is complex, multi-faceted, and challenging. We provide recreation opportunities, access to resources and protect some of the Nation's most significant cultural, historic, and natural places. We serve communities and fulfill our trust and other responsibilities to American Indians, Alaska natives, and the Nation's affiliated island communities. As the Nation's premier conservation agency, our responsibility to leave a legacy of healthy lands and waters, thriving communities, and dynamic economies depends upon our compliance with environmental laws and regulations. We accomplish this with the help of our 70,600 employees, 200,000 volunteers, and thousands of partners. Behind all of the DOI's programs rests a management foundation that is vital to the accomplishment of our mission. The American people are demanding more from their public servants and calling for better business management practices, improved efficiency, financial transparency, and mission accountability.

The DOI continues to support the President's Management Agenda that builds on a foundation for management excellence. As part of the President's Management Agenda, the President's Management Council directed all Federal agencies to improve their overall environmental compliance and performance through implementation of environmental management systems (EMS). Environmental auditing was specifically targeted for management improvement of the Department's environmental compliance and performance. Since environmental compliance serves as the foundation for a successful EMS program, environmental auditing was incorporated into all bureaus' EMS efforts.

For Fiscal Year (FY) 2005, the bureaus reported a total of 3,479 facilities, with a total of 576 environmental audits performed. Collectively, bureaus reported a total of 6,055 environmental audit findings with 2,217 corrective actions completed, based upon audit findings in FY 2005. (An environmental audit finding is a statement of conditions identified at the time the environmental audit is performed requiring response in accordance with environmental audit protocols and applicable legal requirements). A cumulative total of 3,680 environmental audits have been completed to date for all-years (see attached table and chart) and 95 per cent of initial environmental audits have been completed exceeding the DOI's FY 2004 goal of 86 per cent. Another attached chart illustrates a comparison by bureau of environmental audit findings

corrected in FY 2004 and in FY 2005. Overall, it would appear that there is a decrease in the overall number of findings corrected by bureaus. However, since this is the first year that this data comparison was collected, we will continue to monitor it through ensuing years for trend analysis.

Overall, the DOI has made considerable progress in its environmental compliance efforts. However, as stated in the attached table on highest risk audit issues in FY 2005, there is a compelling need for bureaus to provide training for their personnel. These training requirements include environmental requirements, policies, and procedures associated with work activities.

The DOI is fully committed to reducing adverse environmental impacts to public lands and natural resources and to enhance compliance. Assistant Secretaries and Heads of Bureaus and Offices must ensure that senior level managers are fully implementing the requirements of Departmental and respective bureau environmental policies.

If you have any questions, please contact Willie R. Taylor, Director, Office of Environmental Policy and Compliance, at (202) 208-3891.

#### Attachments

cc: Assistant Secretary – PMB  
Assistant Secretaries  
Solicitor  
Deputy Assistant Secretary – P&IA  
REOs  
HazMat Contacts

**ATTACHMENT**

**U.S. Department of the Interior Bureau Summary of Environmental Auditing Programs and Activities for Fiscal Year 2005**

<b>Bureau</b>	<b>Number of Reported Facilities in FY 2005</b>	<b>Number of Environmental Audits Performed in FY 2005</b>	<b>Number of Environmental Audit Findings Reported in FY 2005</b>	<b>Number of Findings per Audit (normalized)</b>	<b>Number of Environmental Audit Findings Corrected in FY 2005</b>	<b>Number of Environmental Audit Findings Corrected in FY 2004</b>	<b>Cumulative Audits Performed (all-years)</b>
<b>BIA</b>	348	97	1,427	14.7 (1,427/97 = 14.7)	N/A	4	239
<b>BLM*</b>	120	36	1,557	43.2 (1,557/36 = 43.2)	1,254**	1,701***	286
<b>BOR</b>	410	45	95	2.1 (95/45 = 2.1)	108	81	323
<b>FWS</b>	860	208	1,143	5.5 (1,143/208 = 5.5)	435	385	1,628
<b>MMS</b>	-	-	-		-	-	-
<b>NBC</b>	47	-	-		-	-	-
<b>NPS</b>	388	27	959	35.5 (959/27 = 35.5)	313	430	458
<b>NPS Concessions (NPS-C)</b>	590	33	717	21.7 (717/33 = 21.7)	35	694	154
<b>OSM</b>	28	20	-		-	-	20
<b>USGS</b>	688	110	157	1.4 (157/110 = 1.4)	72	120	572
<b>DOI Total</b>	3,479	576	6,055	10.5 (6,055/576 = 10.5)	2,217	3,415	3,680

**Notes:**

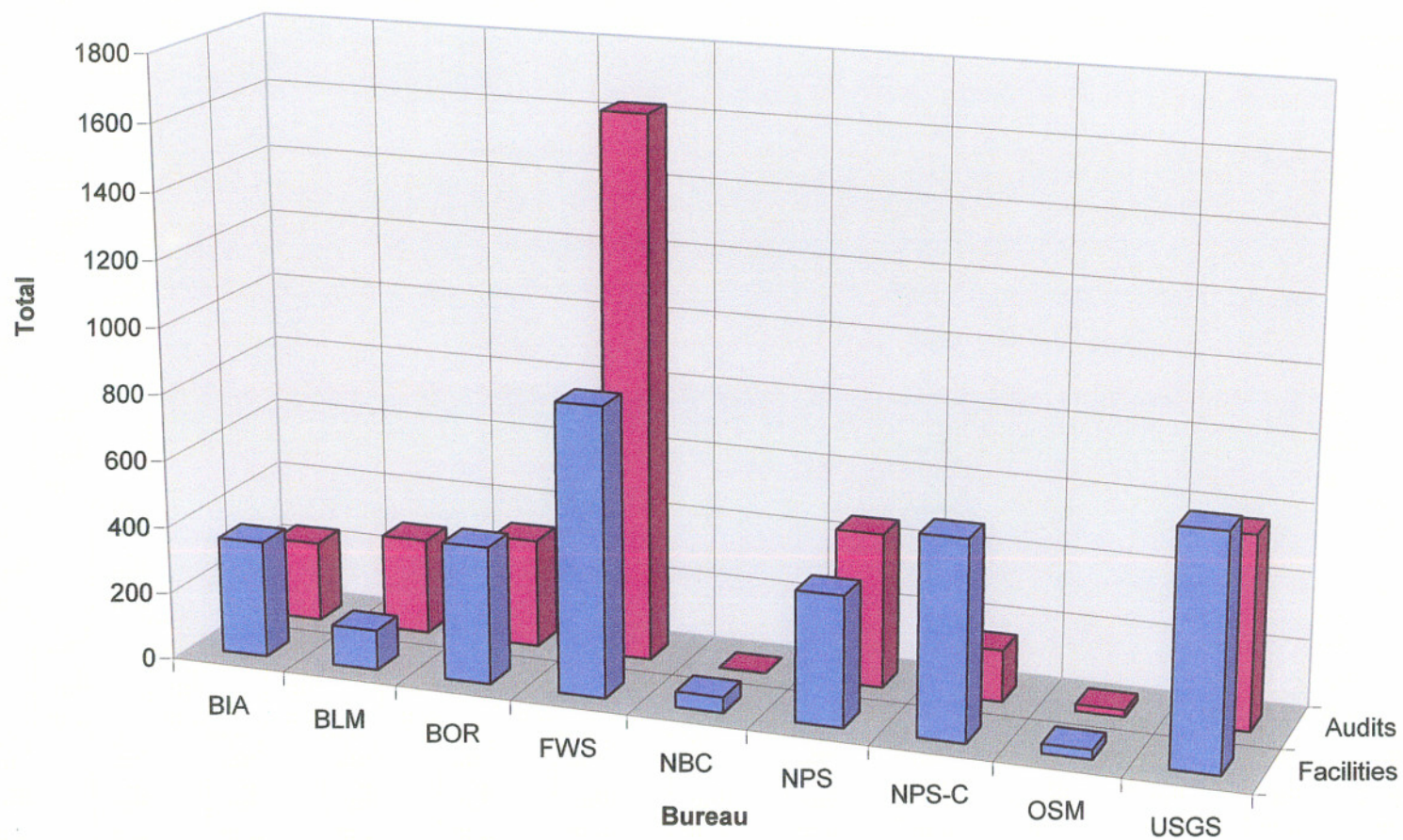
1. N/A = Data not available
2. \* BLM uses the term "organizational units" and not facilities.
3. \*\* BLM: Corrected from 9/30/04 through 9/30/05. \*\*\* BLM: Corrected from 9/30/03 through 9/30/04.

**Highest Risk Audit Issues Identified by Bureaus in Fiscal Year 2005**

Bureau	Issues Identified by Bureau	Bureau Identified Root Cause
BIA	a. Storm water runoff contamination due to inadequate storage of equipment and waste. b. Improper handling, storage and disposal of solid waste.	a. Lack of management emphasis. b. Lack of management emphasis.
BLM	a. Inadequate operation and maintenance of drinking water systems. b. Improper storage and/or transportation of flammable liquids.	a. General lack of employee training on drinking water systems. b. Lack of guidance and the stocking of noncompliant storage containers.
BOR	a. Labeling containers. b. Spill Prevention Control and Countermeasures Plan (SPCC). c. Incompatible materials stored together. d. Flammable materials not stored properly. e. Hazardous waste determination.	a. General lack of employee training on proper labeling. b. General lack of employee understanding of SPCC requirements c. General lack of employee training on storage of flammable materials. d. General lack of employee training on storage of flammable materials e. General lack of employee training on hazardous waste disposal requirements.
FWS	a. Incompatible materials stored together. b. Open floor drains in vehicle maintenance areas.	a. Poor housekeeping and inadequate storage. b. General lack of employee

	training on open floor drains.
	a. Not available.  a. Insufficient support to maintain the environmental program or to correct problems.
	a. Lack of response by regulatory agency. b. Established regulatory environmental policies or procedures are not being followed.

**Cumulative Bureau Environmental Audits and Facilities Reported (all-years)**



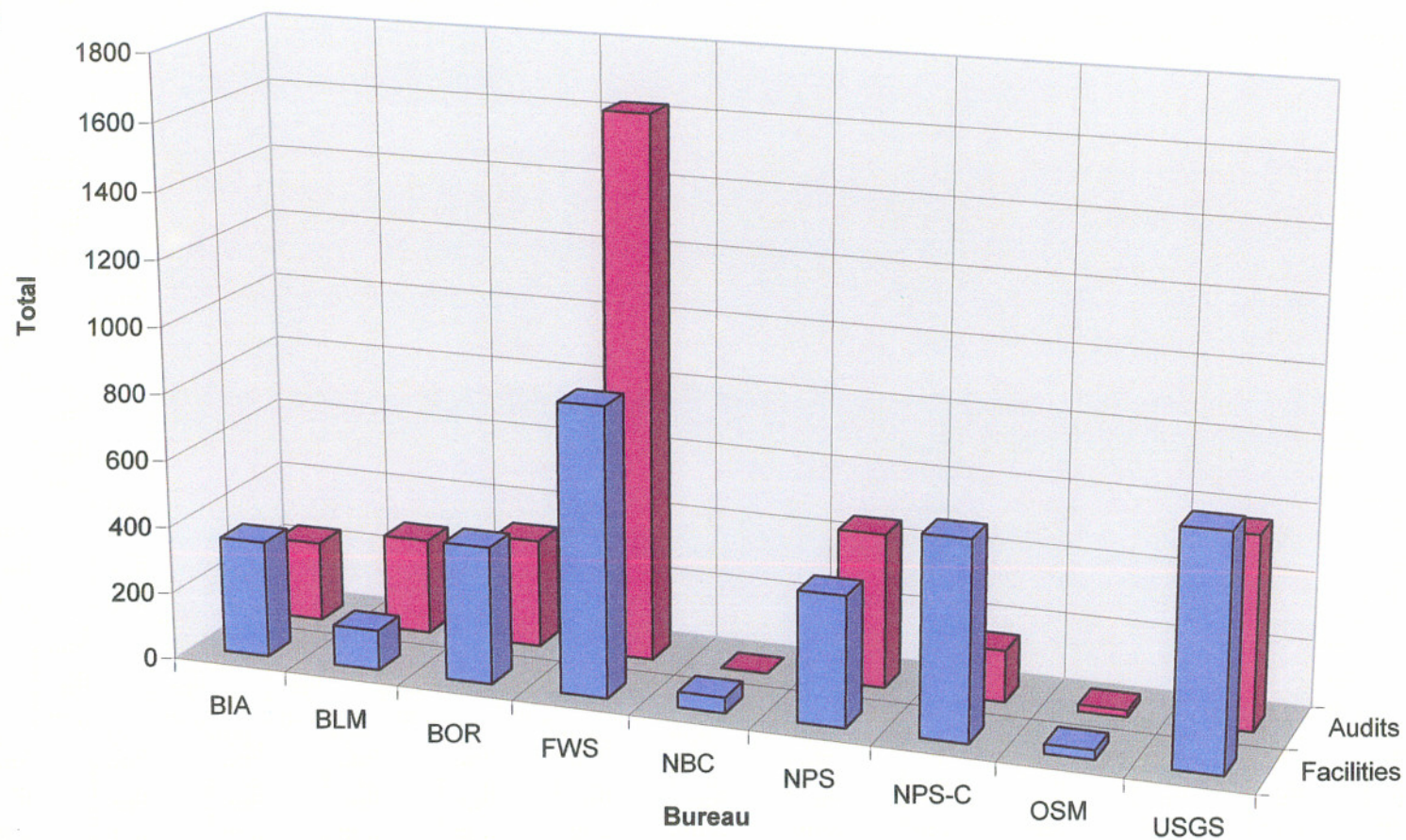
	BIA	BLM	BOR	FWS	NBC	NPS	NPS-C	OSM	USGS
Facilities	348	120	410	860	47	388	590	28	688
Audits	239	286	323	1628	0	458	154	20	572

**Highest Risk Audit Issues Identified by Bureaus in Fiscal Year 2005**

<b>Bureau</b>	<b>Issues Identified by Bureau</b>	<b>Bureau Identified Root Cause</b>
<b>BIA</b>	<ul style="list-style-type: none"> <li>a. Storm water runoff contamination due to inadequate storage of equipment and waste.</li> <li>b. Improper handling, storage and disposal of solid waste.</li> </ul>	<ul style="list-style-type: none"> <li>a. Lack of management emphasis.</li> <li>b. Lack of management emphasis.</li> </ul>
<b>BLM</b>	<ul style="list-style-type: none"> <li>a. Inadequate operation and maintenance of drinking water systems.</li> <li>b. Improper storage and/or transportation of flammable liquids.</li> </ul>	<ul style="list-style-type: none"> <li>a. General lack of employee training on drinking water systems.</li> <li>b. Lack of guidance and the stocking of noncompliant storage containers.</li> </ul>
<b>BOR</b>	<ul style="list-style-type: none"> <li>a. Labeling containers.</li> <li>b. Spill Prevention Control and Countermeasures Plan (SPCC).</li> <li>c. Incompatible materials stored together.</li> <li>d. Flammable materials not stored properly.</li> <li>e. Hazardous waste determination.</li> </ul>	<ul style="list-style-type: none"> <li>a. General lack of employee training on proper labeling.</li> <li>b. General lack of employee understanding of SPCC requirements</li> <li>c. General lack of employee training on storage of flammable materials.</li> <li>d. General lack of employee training on storage of flammable materials</li> <li>e. General lack of employee training on hazardous waste disposal requirements.</li> </ul>
<b>FWS</b>	<ul style="list-style-type: none"> <li>a. Incompatible materials stored together.</li> <li>b. Open floor drains in vehicle maintenance areas.</li> </ul>	<ul style="list-style-type: none"> <li>a. Poor housekeeping and inadequate storage.</li> <li>b. General lack of employee</li> </ul>

		training on open floor drains.
<p><b>NPS</b></p> <p><b>NPS Concessions</b></p>	<p>a. Health and safety including hazard communication and hazardous materials management requirements.</p> <p>a. Fuel storage tanks. b. Incomplete or lack of planning to respond to hazardous substance releases.</p>	<p>a. Not available.</p> <p>a. Insufficient support to maintain the environmental program or to correct problems.</p>
<b>USGS</b>	<p>a. Lack of NPDES permit for discharge.</p> <p>b. Hazardous waste regulatory records are incomplete.</p>	<p>a. Lack of response by regulatory agency.</p> <p>b. Established regulatory environmental policies or procedures are not being followed.</p>

**Cumulative Bureau Environmental Audits and Facilities Reported (all-years)**



	BIA	BLM	BOR	FWS	NBC	NPS	NPS-C	OSM	USGS
Facilities	348	120	410	860	47	388	590	28	688
Audits	239	286	323	1628	0	458	154	20	572